

Performance Audit Report

Horizon Power

**Electricity Integrated Regional Licence No. 2
(EIRL2)**





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24 August 2023

Private and Confidential

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Electricity Integrated Regional Licence No. 2 (EIRL2) Performance Audit

Dear Liang,

We are pleased to provide you with the final Audit Report on the effectiveness of controls procedures in relation to the EIRL2. Our report describes the objective, scope of work performed, approach, and compliance assessment outcomes. This report relates to our procedures performed from April to June 2023.

We would like to take the opportunity to thank the Horizon Power personnel who assisted us throughout the engagement.

If you have any queries regarding our report or the work that it describes, please do not hesitate to contact Isabella Cheong on +61 8 9217 1822 or myself on +61 8 9429 2179.

Yours sincerely



Ernst & Young
Michael Rundus
Partner

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1. Independent Auditor's Report

Scope

We have been engaged by Regional Power Corporation (trading as "Horizon Power") to perform a reasonable assurance engagement, as defined by the Australian Standards on Assurance Engagements, here after referred to as 'the engagement'. The purpose of the engagement is to report whether the measures undertaken by Horizon Power for the period from 1 April 2020 to 31 March 2023, are presented in accordance with the conditions referred to in the EIRL2 (the "Criteria" or "Licence"), in all material respects.

Horizon Power's responsibilities

Horizon Power's management is responsible for compliance to meet the conditions referred to in its EIRL2, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant for compliance with EIRL2, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities

Our responsibility is to express an opinion on Horizon Power's compliance with the conditions referred to in its EIRL2 based on the evidence we have obtained.

We conducted our engagement in accordance with the Australian Standards on Assurance Engagements ("ASAE") 3000 - Assurance Engagements Other than Audits or Reviews of Historical Financial Information issued by the Auditing and Assurance Standards Board (the "AUASB"), ASAE 3100 - Compliance Engagements, the Economic Regulatory Authority's 2019 Audit and Review Guidelines (Electricity and Gas Licences) and the Scope of Work for this engagement as agreed with Horizon Power on 3 April 2023. Those standards require that we plan and perform our engagement to obtain reasonable assurance about whether, in all material respects, Horizon Power complied with the EIRL2 obligations and to issue a report. The nature, timing, and extent of the procedures selected depended on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

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

Our independence and quality control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the Accounting Professional and Ethical Standards Board and have the required competencies and experience to conduct this assurance engagement.

EY also applies Australian Standard on Quality Control 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly 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.

Opinion

In our opinion, except for the effect of the issues set out in the 'Basis for qualified conclusion' section below, Horizon Power maintained, in all material respects, effective control procedures for the period 1 April 2020 to 31 March 2023, in accordance with the conditions of its EIRL2 as outlined in the approved Audit Plan (dated 10 May 2023).

Basis for qualified conclusion:

The 25 Licence obligations listed within Section 2.7 (Summary of Findings - pg. 8) were assessed as non-compliant.

Restricted use

This report is intended solely for the information and use of Horizon Power and the Economic Regulation Authority (collectively the Recipients) and should not be used by anyone other than the Recipients.



Michael Rundus
Partner

24 August 2023

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2. Executive Summary

2.1 Background

Horizon Power is a commercially focused, state government-owned, power company that provides power to regional Western Australia. Horizon Power is responsible for generating, procuring, distributing, and retailing electricity to residential, industrial and commercial customers and resource developments in its service area. Horizon Power has been granted the EIRL2 (Licence) to construct and operate a transmission system, a distribution system and sell electricity to customers in accordance with the terms and conditions of the Licence. Per Section 13(1) of the Electricity Industry Act 2004 (WA), Horizon Power is required to undertake a Performance Audit (Audit) to assess the effectiveness of measures taken by Horizon Power to meet the conditions referred to in EIRL2.

EY was appointed by Horizon Power and approved by the Economic Regulation Authority (ERA) via Approval of Auditor - 2023 Performance Audit letter dated 14 March 2023, to conduct the Audit. The Audit was undertaken in accordance with the Audit Plan presented to the ERA and approved on 10 May 2023.

2.2 Objective

The objective of the Audit was to perform appropriate procedures to obtain reasonable assurance as to whether the measures undertaken by Horizon Power, for the period from 1 April 2020 to 31 March 2023 (Audit Period) are presented in accordance with the obligations referred to in the EIRL2, in all material respects, and issue a written report setting out the Audit conclusion.

2.3 Scope

The scope of the Audit included an assessment of Horizon Power's systems, process effectiveness, and use of regulatory controls based on risk and Audit priority to confirm compliance with the obligations, standards, outputs, and outcomes required by EIRL2, noting progress against past non-compliance was also to be assessed. Specifically, the Audit focused on the following:

- 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 prescribed in the licence throughout the Audit period (i.e. records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- Integrity of reporting - the completeness and accuracy of compliance and performance reporting by Horizon Power to the ERA.
- Prior year post audit implementation plan - the progress and effectiveness of the prior year recommendations and management actions (i.e. for the Audit period 1 April 2017 to 31 March 2020).

The Audit covered all four regional service areas of Horizon Power (i.e. Kimberley, Pilbara, Esperance and Mid-west) and the call centre located in Broome. The Audit excluded the 141 locations being transferred as part of the Remote Essential Services Project (RESP)¹ from the Department of

¹ For details, refer to <https://www.wa.gov.au/organisation/department-of-communities/improving-power-and-water-aboriginal-communities>

Communities from 1 April 2023, as these locations are not within the scope of Horizon Power's services for the Audit Period.

The key legislation, regulations and codes that governed Horizon Power's operations were:

- Electricity Industry (Customer Transfer) Code 2016
- Electricity Industry (Obligation to Connect) Regulations 2005
- Electricity Industry (Customer Contracts) Regulations 2005
- Electricity Industry Act 2004
- Electricity Integrated Regional Licence EIRL 2
- Code of Conduct for the Supply of Electricity to Small Use Customers 2018
- Code of Conduct for the Supply of Electricity to Small Use Customers 2022
- Electricity Industry (Metering) Code 2012
- Electricity Industry (Network Quality and Reliability Supply) Code 2005
- Electricity Compliance Reporting Manual June 2020
- Electricity Compliance Reporting Manual February 2022
- Electricity Compliance Reporting Manual January 2023
- Electricity Compliance Reporting Manual February 2023

Note: The scope covered all the versions of EIRL2 applicable during the period subject to Audit.

2.4 Approach

EY's Audit approach is aligned to the ERA's 2019 Audit and Review Guidelines (ERA Audit Guidelines), ASAE 3000 and ASAE 3100. The following approach was applied for execution of the approved Audit Plan and reporting such that reasonable assurance can be provided regarding the assessment of Horizon Power's compliance with the EIRL2 obligations:

- Conducted risk workshops to establish context for the risk assessment for each licence obligation;
- Identified inherent risks, and assessed risk rating and preliminary control adequacy to determine the Audit Priority ratings for each license obligation (refer to Appendix A);
- Prepared a Draft Audit Plan for ERA review and approval;
- Conducted process walkthroughs with key stakeholders and obtaining relevant documentation to validate the design effectiveness of processes, controls, and systems (refer to Appendix B and C);
- Tested the controls (on a sample basis based on the Audit Priority rating) to determine operating effectiveness;
- Assessed compliance of the EIRL2 applicable licence obligations across Horizon Power's control environment, information systems and control procedures;
- Assessed the status of remediation actions for self-reported non-compliances during the period from April 2020 to March 2023;
- Assessed the status of remediation actions for previous audit non-compliances during the period from April 2017 to March 2020;
- Conducted meetings with key stakeholders to discuss the results from our fieldwork, including findings, ratings, and recommendations for practical improvement (if any); and
- Reporting of compliance assessment outcome to Horizon Power's Management and ERA for review and approval.

The Audit fieldwork was undertaken from April to June 2023 for processes and controls performed across Horizon Power's head office on 18 Brodie Hall Drive, Bentley, WA 6102. The work schedule and Audit team details have been defined in Appendix D and E, respectively.

2.5 Overall observations

Overall, we observed that Horizon Power has in all material respects, apart from the items noted in Section 2.7 (Summary of Findings), maintained effective control procedures for the period 1 April 2020 to 31 March 2023, in accordance with the conditions of its EIRL2 as outlined in the approved Audit Plan (dated 10 May 2023).

A positive culture of compliance was observed, including strong awareness of obligations and understanding of roles and responsibilities by the relevant teams. However, we identified 25 non-compliances which include one (1) major, one (1) moderate and 23 minor impact non-compliances. The identified non-compliances are related to:

- 13 self-reported non-compliances from April 2020 to March 2023:** These include one (1) major, one (1) moderate and 11 minor self-reported non-compliances. Non-compliances were related to communication of planned outages to life support customers, communication with payment difficulty and hardship customers, obtaining verifiable consent for non-standard contracts, the recharge of prepayment meters and the exchange of old / outdated meters with upgraded meters. Horizon Power has undertaken business improvement initiatives to strengthen its control environment.
- 12 non-compliances identified through the Audit:** These include 12 minor non-compliances identified through the Audit. Non-compliances were related to updating non-standard contracts, policies and information on the website; data sources associated to the annual performance reports to the ERA, monitoring of check meter data; and submission of annual renewable source reports.

Noting that the total number of applicable obligations has increased for the Audit period by 20% (i.e. a total of 457 obligations in 2023 compared to 381 obligations in 2020)², the number of non-compliances identified during the 2023 ERA Audit have marginally increased by 1.5%, from 17 non-compliances (4%) in the 2020 ERA Audit to 25 non-compliances (5.5%) for this Audit.

2.6 Deviations from the Audit Plan

A deviation to the approved Audit Plan occurred for three (3) obligations which were determined to be 'Not Applicable' to Horizon Power's operations during the course of our Audit fieldwork. See table below.

Table 1: EIRL2 obligations not relevant

Obligation no.	License obligation	Auditor's comments
274 A	If a customer's tariffs, fees or charges are not regulated or set by the State Government, a retailer must give notice to a customer of any variation to its tariffs, fees or charges, that affects the customer in the manner specified in subclauses 71(3) and (4).	Horizon Power is a State Government owned Government Trading Enterprise (GTE) which operates under the Electricity Corporations Act 2005 (WA) and is governed by a Board of Directors accountable to the Minister for Energy. While large use customers of Horizon Power may be subject to unregulated tariffs, Horizon Power's tariffs for small use / residential customers (which represent the majority of Horizon Power's customers) are regulated by the State Government. As such, this compliance obligation is not applicable to

² The increase in the number of obligations is due to the new Code of Conduct 2022.

Obligation no.	License obligation	Auditor's comments
		Horizon Power for the purposes of this Audit.
297 H	A retailer must confirm periodically the information held in relation to the life-support equipment scheme is/has not changed in the manner prescribed under subclause 85(1).	This compliance obligation requirement is already covered through obligation 240. As such, this compliance obligation is essentially a duplicate and was not separately covered as part of the compliance testing.
289	A distributor must publish information on distribution standards and metering arrangements on its website.	This compliance obligation requirement is already covered through obligation 283A. As such, this compliance obligation is essentially a duplicate and was not separately covered as part of the compliance testing.

2.7 Summary of findings

The table below summarises the 25 findings identified in relation to the Licence obligations during the period 1 April 2020 to 31 March 2023, where Horizon Power had instances of non-compliance with the Licence obligations and/or where control deficiencies were noted.

Table 2: Non-compliance with the EIRL2 obligations

Obligation no.	License obligation	Findings	Auditor's recommendations
87	Electricity Industry (Customer Contracts) Regulations (2005), regulation 13 A non-standard contract must describe the prices payable and the circumstances in which the prices are payable, plus the way the retailer publishes and gives notice of variations to its price information.	Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls) The non-standard contract does not include information on how Horizon Power publishes and gives notice of variations to its price information.	The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the MyPower product since July 2021. However, the active non-standard contracts with existing customers should be revised to reflect the information on how Horizon Power publishes and gives notice of variations to its price information.
90	Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(1A), 16(2) and 34: A non-standard contract must inform the customer that the provisions of the contract	Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls) The non-standard contract does not include any information on the process for amending the contract, including requirements for approval and	The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the Mypower product since July 2021.

Obligation no.	License obligation	Findings	Auditor's recommendations
	<p>may be amended without the customer's consent, where the amendment is required for the contract to remain consistent with a written law. A non-standard contract must describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published. The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p>	<p>the way the amendment will be published, per the Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(2).</p>	<p>However, the active non-standard contracts with existing customers should be revised to reflect the information on the process for amending the contract, including requirements for approval and the way the amendment will be published, per the Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(2).</p>
98B	<p>Electricity Industry (Customer Contracts) Regulations (2005), regulation 34B:</p> <p>A non-standard contract for residential customers must not state that the residential customer is required to pay a security deposit.</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Clause 19 of the Non-standard contract includes that Horizon Power can require security from time to time from customers, which is in contravention of the regulation 34B. However, it is to be noted that Horizon Power has not accepted any security deposits during the Audit period.</p>	<p>The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the Mypower product since July 2021.</p> <p>However, the active non-standard contracts with existing residential customers should be revised to remove the clause relating to the security deposit.</p>
124	<p>Electricity Industry Act, section 11</p> <p>Integrated Regional Licence, condition 4.5.1</p> <p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under</p>	<p>Non-compliance and Control Deficiency rating - C/2 (non-compliant with inadequate controls)</p> <p>Horizon Power utilises Power BI and Velocity (Horizon Power's billing system) reporting to prepare the Annual Performance Reports, outlining CSC and network performance metrics, which are presented in</p>	<p>Horizon Power CSC Team should retain the source point in time data/reports used to prepare the Annual Performance Reports to provide an audit trail to verify the accuracy and completeness of information reported.</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
	the Electricity Industry Act.	the manner prescribed by the ERA. It was noted that the reporting is performed at a point in time, and historical data is unable to be generated. Additionally, the source point in time data/ reporting is not retained by the CSC Team to provide an audit trail to verify the accuracy and completeness of the Annual Performance Reports.	
132	<p>Code of Conduct (2018), clause 2.3(1)/ Code of Conduct (2022), clause 10(1):</p> <p>A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 10(1).</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20, as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering into a non-standard contract.</p>	No further action required as following the breach in 2019-20, Horizon Power have amended the relevant call script to confirm that verifiable consent is obtained before entering into a non-standard contract.
135	<p>Code of Conduct (2018), clause 2.3(5)/ Code of Conduct (2022), clause 10(5):</p> <p>Subject to subclause 10(4), a retailer or electricity marketing agent must obtain the customer's verifiable confirmation that the specified information in subclause 10(2), as applicable, has been provided.</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20, as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering into a non-standard contract.</p>	No further action required as following the breach in 2019-20, Horizon Power have amended the relevant call script to confirm that verifiable consent is obtained before entering into a non-standard contract.

Obligation no.	License obligation	Findings	Auditor's recommendations
209	<p>Code of Conduct (2018), clause 6.3 (1) (a) :</p> <p>If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as all customers enquiring about payment difficulty or hardship were offered an interest free and fee free payment plan, however not all customers are offered a one-off additional time to pay.</p> <p>Through discussions, we understand that the requirement to offer additional time to pay as a standalone, in every circumstance, seems to be one which would ignore the customers' expressed position in many cases, particularly those customers referred to the credit team, where through the conversation it is obvious that a customer is in financial hardship and will not find a one-off additional time to pay helpful. In these circumstances, customers are generally seeking assistance to pay regular small payments using an instalment plan over a longer period.</p> <p>We were advised that the options of 'additional time to pay a bill' or 'a payment plan for the amount owing' are provided to customers based on their past payment history, including any previous payment plan arrangement.</p>	<p>Horizon Power had taken a business decision to assess customer needs and provide suitable options for payment that may not always include the provision of additional time for payment. This decision was undertaken for the obligation requirement between 2018 to 2022.</p> <p>As per the recent amendment to the Code of Conduct 2022, Horizon Power should assess and comply with Clause 41 requirements by making available additional time to pay bills and payment plans for those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.</p>
211	<p>Code of Conduct (2018), clause 6.4 (1) (a) / Code of Conduct (2022),</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally</p>	<p>Horizon Power had taken a business decision to assess customer needs</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
	<p>clause 41(1) (a):</p> <p>A retailer must offer the residential customer additional time to pay a bill.</p>	<p>adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as all customers enquiring about payment difficulty or hardship were offered an interest free and fee free payment plan, however not all customers are offered a one-off additional time to pay.</p> <p>Through discussions, we understand that the requirement to offer additional time to pay as a standalone, in every circumstance, seems to be one which would ignore the customers' expressed position in many cases, particularly those customers referred to the credit team, where through the conversation it is obvious that a customer is in financial hardship and will not find a one-off additional time to pay helpful. In these circumstances, customers are generally seeking assistance to pay regular small payments using an instalment plan over a longer period.</p> <p>We were advised that the options of 'additional time to pay a bill' or 'a payment plan for the amount owing' are provided to customers based on their past payment history, including any previous payment plan arrangement.</p>	<p>and provide suitable options for payment that may not always include the provision of additional time for payment.</p> <p>As per the recent amendment to the Code of Conduct 2022, Horizon Power should assess and comply with Clause 41 requirements by making available additional time to pay bills and payment plans for those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.</p>
214	<p>Code of Conduct (2018), clause 6.4 (3)/ Code of Conduct (2022), clause 43 (5):</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Through enquiries with the</p>	<p>Horizon Power should update the template for payment arrangement letters to include the consequences of not</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
	<p>If a residential customer accepts a payment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 43(5) within 5 business days.</p>	<p>Retail Operations Manager and review of the payment arrangement letters shared with customers, we noted Horizon Power provides customers with confirmation of their payment arrangement within 5 business days. We noted once a payment arrangement plan has been set up through the billing system (i.e. Velocity) and agreed with the customer, the system automatically triggers a payment arrangement letter to be sent to the customer.</p> <p>Through our sample testing of 10 payment arrangement letters for Hardship and Payment difficulty customers, we observed that the consequences of not complying with the payment plan was not documented. However, we have not noticed any evidence where customers were negatively impacted</p>	<p>complying with the payment plan as per the Code of Conduct 2018 and 2022.</p>
218	<p>Code of Conduct (2018), clause 6.8/ Code of Conduct (2022), clause 45 (3):</p> <p>A retailer must advise a customer experiencing financial hardship of the information specified in subclause 45(3).</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Through our sample testing of 10 memo logs (documented interaction with customer and Customer Service Representative (CSR) from April 2020 to March 2023 in Velocity and payment arrangement letters for Hardship and Payment difficulty customers, we observed that the following items were not documented /communicated to the customers:</p> <p>(a) customer's right to have a bill redirected to a different address (including an email</p>	<p>Horizon Power should update the call scripts and record all information in memo logs to confirm that the following information is provided as per the Code of Conduct 2018 and 2022:</p> <p>(a) customer's right to have a bill redirected to a different address (including an email address) at no charge; and</p> <p>(b) payment methods available to the customer; and</p> <p>(c) concessions that may be available to the customer and how to access them; and</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
		<p>address) at no charge; (b) payment methods available to the customer; (c) concessions that may be available to the customer and how to access them; (d) different types of tariffs that may be available to the customer; (e) independent financial counselling services and relevant consumer representatives available to assist the customer; and (f) availability of any other financial assistance offered by the retailer, and how to access this assistance.</p> <p>Although, we were advised that that all the information is provided to the Hardship customer as per subclause 45(3) of the Code of Conduct, 2022, Horizon Power does not have functionality to record the calls between the customer and CSR to confirm that the information as required under the Code of Conduct is adequately communicated.</p>	<p>(d) different types of tariffs that may be available to the customer; (e) independent financial counselling services and relevant consumer representatives available to assist the customer; and (f) availability of any other financial assistance offered by the retailer, and how to access this assistance.</p> <p>Further, Horizon Power should explore the functionality of recording calls with Hardship and Payment difficulty customers,</p>
229	<p>Code of Conduct (2018), clause 6.4 / Code of Conduct (2022), clause 48:</p> <p>Before arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a written notice (a reminder notice), which contains the information specified in subclause 48(1)(a), not less than 15 business days from the dispatch date of the bill. The</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20 Annual Compliance Report as the standard disconnection notice template did not include a reference to the complaint handling process, contact number and option to access the Electricity Ombudsman.</p> <p>We further understand that 7889 customers were issued</p>	<p>No further action is required as Horizon Power has updated the disconnection notice template to include the reference to the complaint handling process, contact number and option to access the Electricity Ombudsman and has complied in 2020-21 and 2021-22.</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
	retailer must use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and timeframes specified in subclause 48(1)(c).	the disconnection warning letters during 2019-20 and the missing information was subsequently communicated in customer bills, reminder notices and via the complaint handling process.	
238	<p>Code of Conduct (2018), clause 7.7(4)</p> <p>If life support equipment is registered at a customers' supply address under subclause 7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b).</p>	<p>Non-compliance and Control Deficiency rating - B/4 (non-compliant with generally adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2020-21 and 2021-22 Annual Compliance Report as follows:</p> <ul style="list-style-type: none"> In 2020-2021, One Life Support Customer was disconnected for a planned power interruption. The customer was notified of the planned outage in writing, 3 days prior to the interruption, however acknowledgement of receipt (by verbal, written or electronic means) from the customer, or someone residing at the supply address, was not obtained by Horizon Power. In 2021-22, Two customers who had persons residing at those supply addresses who required life support equipment had their electricity interrupted during a planned power interruption. While Horizon Power notified each customer of the planned power interruption in writing in accordance with clause 7.7(4)(b) of the Code 	<p>Following the life support notification breach in 2021-22, Horizon Power has implemented a quality assurance process around life support and planned outages to improve identification and communication with life support customers. Horizon Power should continue to focus on the following to prevent incidents reoccurring:</p> <ul style="list-style-type: none"> Training of Customer Service and Community (CSC) staff on the planned outage process. Health check reports to confirm that life support equipment details are correct in the OCS (Outage Capture System) and improve data quality. Focus on longer-term system solutions to prevent non-compliance.

Obligation no.	License obligation	Findings	Auditor's recommendations
		<p>on 7 October 2021 (Relevant Notice), Horizon Power failed in complying with the Life Support Notice Requirement, as the Relevant Notice incorrectly indicated that the planned power interruption was to occur on 12 October 2021, when in fact, the planned power interruption was scheduled for 13 October 2021.</p>	
240	<p>Code of Conduct (2018), clause 7.7(6)/ Code of Conduct (2022), clause 85 (1)</p> <p>A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as follows:</p> <p>Although Horizon Power has policies and procedures in place, they have not requested annual confirmation, three (3) year re-certification or removed life support customers from the life support register during the reporting period.</p>	<p>Horizon Power has started implementing the existing policy from January 2023 to request the annual confirmation and re-certification from existing and new life support customers every three years.</p> <p>The purpose of the process is to confirm that relevant information is received from all life support customers within the required timeframe as per the Code of Conduct, 2018 and 2022.</p> <p>An additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation.</p>
259 B	<p>Code of Conduct (2022), clause 60(3):</p> <p>If a pre-payment meter has been de-energised and the customer makes</p>	<p>Non-compliance and Control Deficiency rating - B/3 (non-compliant with generally adequate controls)</p> <p>This compliance obligation was</p>	<p>Horizon Power should establish controls to re-energise pre-payment meters immediately upon customer payment. This should also include</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
	a payment to their account that results in an amount of credit in excess of emergency credit, the retailer must re-energise the meter.	self-reported as non-compliant to the ERA in February 2023. It was reported that 15 customers had extended duration of power outage due to a technical issue with the pre-payment metering system SGCS (Smart Grid Customer Information System). SGCS did not recognise the payments made by the 15 customers to their accounts and hence, did not re-energise the meters. This issue was found by Horizon Power to be primarily due to an expired security certificate. Horizon Power advised that these customers each had the applicable credit applied and their meter re-energised within one (1) business day of the issue being identified.	monitoring of security certificates expiry, or any other factors that could impact upon the timely re-energisation of the meter, to confirm that such instances do not occur in future.
283A	Code of Conduct (2018), clause 10.8 (2) / Code of Conduct (2022), clause 75 (1) A distributor must publish on its website the information detailed in subclause 75(1)(a) to (k).	Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls) Horizon Power's website does not include information about how a customer can obtain information on distribution standards and metering arrangements as per the clause 75 (1) (h). Additionally, the Code of Conduct (2022) is not available on Horizon Power's website as per clause 75 (1) (k).	Horizon Power should publish the information about how a customer may obtain information on distribution standards and metering arrangements on the Horizon Power website. Horizon Power should also publish a copy of the Code of Conduct (2022) on the Horizon Power website.
299	Code of Conduct (2018), clause 12.1 (2) / Code of Conduct (2022), clause 87 (2) The complaints handling process under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c), and (d) and be made available at	Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls) The Process Customer Complaint document does not include details of the response process to customers in relation to complaints as per clause 87(2) (d) of the Code of Conduct (2022).	Horizon Power should include the response process to customers in relation to complaints in the Process Customer Complaint document.

Obligation no.	License obligation	Findings	Auditor's recommendations
	no cost.		
299A	<p>Code of Conduct (2018), clause 12.1 (2)(a) / Code of Conduct (2022), clause 87(3)</p> <p>The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014.</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>The Process Customer Complaint document has not been updated to reflect AS/NZS 10002:2014 as per clause 87(3) of the Code of Conduct(2022) (currently, references AS/NZS 10002:2006). Specifically, the following items are not captured:</p> <ul style="list-style-type: none"> • Commitment towards appropriate privacy statement; • Roles and responsibilities of Horizon Power's key stakeholders; • Definition of continuous improvement and internal reporting practices, including root cause analysis and trend monitoring; • Information to be provided to the complainants; and • Training. 	<p>Horizon Power should perform a detailed review of the Process Customer Complaint document against AS/NZS 10002:2014 and address potential improvements. At minimum, the following should be included:</p> <ul style="list-style-type: none"> • Commitment towards appropriate privacy statement; • Roles and responsibilities of Horizon Power's key stakeholders; • Definition of continuous improvement and internal reporting practices, including root cause analysis and trend monitoring; • Information to be provided to the complainants; and • Training
307B	<p>Code of Conduct (2022), clause 91(2)</p> <p>The family violence policy must provide for the details as prescribed in subclauses 91(2)(a) to (j).</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>The Family Violence Policy does not include a requirement that a vulnerable customer should be advised about the consequences of being named on the account of a residential customer who is not vulnerable per the Code of Conduct (2022), clause 91(2)(b).</p>	<p>Horizon Power should review and update the Family Violence Policy as per the Code of Conduct (2022) by including a requirement to advise a vulnerable customer about the consequences of being named on the account of a residential customer who is not vulnerable.</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
319	<p>Electricity Industry Metering Code, clause 3.1</p> <p>A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p>	<p>Non-compliance and Control Deficiency rating - A/2 (non-compliant with adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>
326	<p>Electricity Industry Metering Code, clause 3.5(1) and 3.5(2)</p> <p>A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p>	<p>Non-compliance and Control Deficiency rating - A/2 (non-compliant with adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
		change in owner/tenant.	
327	<p>Electricity Industry Metering Code, clause 3.5(3)</p> <p>For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p>	<p>Non-compliance and Control Deficiency rating - A/2 (non-compliant with adequate controls)</p> <ul style="list-style-type: none"> Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant. 	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>
333	<p>Electricity Industry Metering Code, clause 3.9(3)</p> <p>Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.</p>	<p>Non-compliance and Control Deficiency rating - A/2 (non-compliant with adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>

Obligation no.	License obligation	Findings	Auditor's recommendations
		procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.	
341	<p>Electricity Industry Metering Code, clause 3.11A(2)</p> <p>Subject to clause 3.11A(3), if a population of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.</p>	<p>Non-compliance and Control Deficiency rating - A/2 (non-compliant with adequate controls)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.
423	<p>Electricity Industry Metering Code, clause 5.22 (2)</p> <p>The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.</p>	<p>Non-compliance and Control Deficiency rating - B/2 (non-compliant with generally adequate controls)</p> <p>During our testing we observed that Horizon Power has installed six (6) check meters for major customer accounts. However, there is no process implemented to use check metering data to validate the energy data of revenue metering installations and to enhance the quality and reliability of the energy data. We acknowledge that there are</p>	Horizon Power should document and implement a process to use check metering data, where available, to validate revenue meter energy data with check meter energy data.

Obligation no.	License obligation	Findings	Auditor's recommendations
		other validation protocols configured within metering database platform (i.e. mData21) to confirm reliability of the revenue meter data.	
489	<p>Electricity Industry (Licence Conditions) Regulations, regulation 7</p> <p>The licensee must submit to the coordinator a written report detailing the amount of renewable source electricity purchased by the licensee and the cost of purchasing that renewable source electricity as soon as practicable at the end of each financial year.</p>	<p>Non-compliance and Control Deficiency rating - C/2 (non-compliant with significant improvement required)</p> <p>Horizon Power is required to report the amount of renewable source electricity purchased and cost of purchasing distributed under approved contracts after the end of each financial year to the coordinator (EPWA - Energy Policy WA). Through interviews with the Customer Service and Community Senior Manager we noted that the annual report covering the above-mentioned details as per regulation 7 of the Electricity Industry (Licence Conditions) Regulations, was not submitted and could not be provided for the purpose of compliance testing.</p>	<p>Horizon Power should prepare and submit a report covering the following items to the EPWA (coordinator):</p> <ul style="list-style-type: none"> the amount of renewable source electricity purchased and the cost of purchasing that renewable source electricity <p>The reports submitted to the EPWA coordinator should be maintained for the purpose of maintaining an audit trail.</p>

2.8 Summary of previous audit recommendations

This Audit considered Horizon Power's progress in completing the action plans detailed in the 2020 Performance Audit Report.

Based on our examination of relevant documents, discussion with Horizon Power personnel and consideration of the results of testing against the associated Licence obligations, we determined that Horizon Power has completed and closed out three (3) action plans (out of 13 management actions) detailed in the 2020 Performance Audit Report.

Refer to Section 4 Previous Audit non-compliances and recommendations of this report for further details.

2.9 Summary of recommendations to address current non-compliances and control deficiencies

The table below summarises the recommendations raised to address the current non-compliances

and control deficiencies identified during the Audit. These recommendations have been discussed with Horizon Power management and will be incorporated into the Post Audit Implementation Plan.

Table 3: Recommendations to Address Current Non-Compliances and Control Deficiencies

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
01/2023	<p>B/2 Compliance Obligation - 87 Electricity Industry (Customer Contracts) Regulations (2005), regulation 13</p> <p>The non-standard contract does not include information on how Horizon Power publishes and gives notice of variations to its price information.</p>	<p>The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the MyPower product since July 2021.</p> <p>However, the active non-standard contracts with existing customers should be revised to reflect the information on how Horizon Power publishes and gives notice of variations to its price information.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
02/2023	<p>B/2 Compliance Obligation - 90 Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(1A), 16(2) and 34:</p> <p>The non-standard contract does not include any information on the process for amending the contract, including requirements for approval and the way the amendment will be published.</p>	<p>The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the MyPower product since July 2021.</p> <p>However, the active non-standard contracts with existing customers should be revised to reflect the information on the process for amending the contract, including requirements for approval and the way the amendment will be published, per the Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(2).</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
03/2023	<p>B/2 Compliance Obligation -98B Electricity Industry (Customer Contracts) Regulations (2005), regulation 34B:</p> <p>Clause 19 of the Non-standard contract includes that Horizon Power can require security from time to time from customers, which is in contravention of the</p>	<p>The non-standard contract template need not be revised as the offering of a non-standard contract has been discontinued due to the discontinuation of the MyPower product since July 2021.</p> <p>However, the active non-standard contracts with existing residential customers should be revised to remove the clause relating to the security deposit.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	regulation 34B. However, it is to be noted that Horizon Power has not accepted any security deposits during the Audit period.		
04/2023	<p>C/2 Compliance Obligation -124 Integrated Regional Licence, condition 4.5.1:</p> <p>Horizon Power utilises Power BI and Velocity reporting to prepare the Annual Performance Reports, outlining CSC and network performance metrics, which are presented in the manner prescribed by the ERA. It was noted that the reporting is point in time and historical data is unable to be generated. Additionally, the source point in time data/reporting is not retained by the CSC Team to provide an audit trail to verify the accuracy and completeness of the Annual Performance Reports.</p>	Horizon Power CSC Team should retain the source point in time data/reports used to prepare the Annual Performance Reports to provide an audit trail to verify the accuracy and completeness of information reported.	The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.
05/2023	<p>B/2 Obligation No. 132 Code of Conduct (2018), clause 2.3(1)/ Code of Conduct (2022), clause 10(1):</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20 as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering into a non-standard contract.</p>	No further action is required as Horizon Power management advised that usage of non-standard contracts was discontinued due to the discontinuation of the MyPower product which has not been offered since July 2021; hence, this obligation is no longer relevant to Horizon Power.	Not applicable.

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
06/2023	<p>B/2 Obligation No. 135 Code of Conduct (2018), clause 2.3(5)/ Code of Conduct (2022), clause 10(5):</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20 as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering into a non-standard contract.</p>	<p>No further action is required as Horizon Power management advised that usage of non-standard contracts was discontinued due to the discontinuation of the MyPower product which has not been offered since July 2021; hence, this obligation is no longer relevant to Horizon Power.</p>	<p>Not applicable.</p>
07/2023	<p>B/2 Obligation No. 209 Code of Conduct (2018), clause 6.3 (1) (a)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as all customers enquiring about payment difficulty or hardship were offered an interest free and fee free payment plan, however not all customers are offered a one-off additional time to pay.</p>	<p>Horizon Power had taken a business decision to assess customer needs and provide suitable options for payment that may not always include the provision of additional time for payment. This decision was undertaken for the obligation requirement between 2018 to 2022.</p> <p>As per the recent amendment to the Code of Conduct 2022, Horizon Power should assess and comply with Clause 41 requirements by making available additional time to pay bills and payment plans for those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
08/2023	<p>B/2 Obligation No. 211 Code of Conduct (2018), Clause 6.4 (1) (a) / Code of Conduct (2022), Clause 41 (1) (a):</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance</p>	<p>Horizon Power had taken a business decision to assess customer needs and provide suitable options for payment that may not always include the provision of additional time for payment.</p> <p>As per the recent amendment to the Code of Conduct 2022, Horizon Power should assess and comply with Clause 41 requirements by making available additional time to pay bills</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>Report as all customers enquiring about payment difficulty or hardship were offered an interest free and fee free payment plan, however not all customers are offered a one-off additional time to pay.</p>	<p>and payment plans for those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.</p>	
<p>09/2023</p>	<p>B/2 Obligation No. 214 Code of Conduct (2018), clause 6.4 (3) / Code of Conduct (2022), clause 43 (5):</p> <p>Through enquiries with the Retail Operations Manager and review of the payment arrangement letters shared with customers, we noted Horizon Power provides customers with confirmation of their payment arrangement within 5 business days. We noted once a payment arrangement plan has been set up through the billing system (i.e. Velocity) and agreed with the customer, the system automatically triggers a payment arrangement letter and sent to the customer.</p> <p>Through our sample testing of payment arrangement letters of Hardship and Payment difficulty customers, we observed that the consequences of not complying with the payment plan was not documented. However, we have not noticed any evidence where customers were negatively</p>	<p>Horizon Power should update the template of payment arrangement letters to include the consequences of not complying with the payment plan as per the Code of Conduct 2018 and 2022.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	impacted		
10/2023	<p>B/2 Obligation No. 218 Code of Conduct (2018), clause 6.8/ Code of Conduct (2022), clause 45 (3):</p> <p>Through our sample testing of memo logs (documented interaction with customer and Customer Service Representative) in Velocity and payment arrangement letters of Hardship and Payment difficulty customers, we observed that the following items were not documented /communicated to the customers:</p> <p>(a) customer's right to have a bill redirected to a different address (including an email address) at no charge; and</p> <p>(b) payment methods available to the customer; and</p> <p>(c) concessions that may be available to the customer and how to access them; and</p> <p>(d) different types of tariffs that may be available to the customer;</p> <p>(e) independent financial counselling services and relevant consumer representatives available to assist the customer; and</p> <p>(f) availability of any other financial assistance offered by the retailer, and how to access this assistance.</p> <p>Although, we were advised that that all the information is provided to the Hardship</p>	<p>Horizon Power should update the call scripts and record all information in memo logs to confirm that the following information is provided as per the Code of Conduct 2018 and 2022:</p> <p>(a) customer's right to have a bill redirected to a different address (including an email address) at no charge</p> <p>(b) payment methods available to the customer</p> <p>(c) concessions that may be available to the customer and how to access them;</p> <p>(d) different types of tariffs that may be available to the customer;</p> <p>(e) independent financial counselling services and relevant consumer representatives available to assist the customer; and</p> <p>(f) availability of any other financial assistance offered by the retailer, and how to access this assistance.</p> <p>Further, Horizon Power should explore the functionality of recording call records with Hardship and Payment difficulty customers,</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	customer as per subclause 45(3) of the Code of Conduct, 2022. Horizon Power does not have functionality to record the calls between customer and Customer Service Representative to confirm that the information as required under the Code of Conduct is adequately communicated.		
11/2023	<p>B/2 Obligation No. 229 Code of Conduct (2018), clause 6.4 / Code of Conduct (2022), clause 48:</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20 Annual Compliance Report as the standard disconnection notice template did not include a reference to the complaint handling process, contact number and option to access the Electricity Ombudsman. We further understand that 7889 customers were issued the disconnection warning letters during 2019-20 and the missing information was subsequently communicated in customer bills, reminder notices and complaint handling process.</p>	No further action is required as Horizon Power has updated the disconnection notice template to include the reference to the complaint handling process, contact number and option to access the Electricity Ombudsman and has complied in 2020-21 and 2021-22.	Not applicable.
12/2023	<p>B/4 Obligation No. 238 Code of Conduct (2018), clause 7.7(4)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2020-21 and 2021-22 Annual Compliance Report</p>	<p>Following the last life support notification breach, Horizon Power has implemented a quality assurance process around life support and planned outages to identify and communicate with life support customers. Horizon Power should continue to focus on the following to prevent such incidents:</p> <ul style="list-style-type: none"> • Training of Customer Service and 	The action is ongoing and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>as follows:</p> <ul style="list-style-type: none"> • In 2020-2021, One Life Support Customer was disconnected for a planned power interruption. The customer was notified of the planned outage in writing, three days prior to the interruption, however acknowledgement of receipt (by verbal, written or electronic means) from the customer, or someone residing at the supply address, was not obtained by Horizon Power. • In 2021-22, Two customers who had persons residing at those supply addresses who require life support equipment had their electricity interrupted during a planned power interruption. While Horizon Power notified each customer of the planned power interruption in writing in accordance with clause 7.7(4)(b) of the Code on 7 October 2021 (Relevant Notice), Horizon Power failed in complying with the Life Support Notice Requirement, as the Relevant Notice incorrectly indicated that the planned power interruption was to occur on 12 October 2021, when in fact, the planned power 	<p>Community (CSC) staff on the planned outage process.</p> <ul style="list-style-type: none"> • Health check reports to confirm that life support equipment details are correct in the OCS (Outage Capture System) and improve the data quality. • Focus on longer-term system solutions to prevent non-compliance. 	

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	interruption was scheduled for 13 October 2021.		
13/2023	<p>B/2 Obligation No. 240 Code of Conduct (2018), clause 7.7(6)/ Code of Conduct (2022), clause 85 (1)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as follows:</p> <p>Although Horizon Power has policies and procedures in place, they have not requested annual confirmation, three (3) year re-certification or removed life support customers from the life support register during the reporting period.</p>	<p>Horizon Power has started implementing the existing policy from January 2023 to request the annual confirmation and re-certification from existing and new life support customers every three years.</p> <p>The purpose of the process is to confirm that relevant information is received from all life support customers within the required timeframe as per the Code of Conduct, 2018 and 2022.</p> <p>An additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation.</p>	The action is ongoing and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.
14/2023	<p>B/3 Obligation No. 259 B Code of Conduct (2022), clause 60(3):</p> <p>This compliance obligation was self-reported as non-compliant to the ERA in February 2023. It was reported that 15 customers had extended duration of power outage due to a technical issue with the pre-payment metering system SGCIS (Smart Grid Customer Information System). SGCIS did not recognise the payments made by the 15 customers to their accounts and hence, did not re-</p>	Horizon Power should establish controls to re-energise pre-payment meters immediately upon customer payment. This should also include monitoring of security certificates expiry, or any other factors that could impact upon the timely re-energisation of the meter, to confirm that such instances do not occur in future.	The recommendation is ongoing to be addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	energise the meters. This issue was found by Horizon Power to be primarily due to an expired security certificate.		
15/2023	<p>B/2 Obligation No. 283A Code of Conduct (2018), clause 10.8 (2) / Code of Conduct (2022), clause 75 (1)</p> <p>Horizon Power's website does not include information about how a customer may obtain information on distribution standards and metering arrangements as per the clause 75 (1) (h). Additionally, the Code of Conduct (2022) is not available on Horizon Power's website as per clause 75 (1) (k).</p>	Horizon Power should publish the information about how a customer may obtain information on distribution standards and metering arrangements on the Horizon Power website. Horizon Power should also publish a copy of the Code of Conduct (2022) on the Horizon Power website	The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.
16/2023	<p>B/2 Obligation No. 299 Code of Conduct (2018), clause 12.1 (2) / Code of Conduct (2022), clause 87 (2):</p> <p>The Process Customer Complaint document does not include details of the response process to customers in relation to complaints.</p>	Horizon Power should include the response process to customers on complaints in the Process Customer Complaint document.	The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.
17/2023	<p>B/2 Obligation No. 299 A Code of Conduct (2018), clause 12.1/ Code of Conduct (2022), clause 87(3)</p> <p>The Process Customer Complaint document does not include the response process and has not been</p>	<p>Horizon Power should perform a detailed review of the Process Customer Complaint document against AS/NZS 10002:2014 and address potential improvements. At minimum, the following should be included:</p> <ul style="list-style-type: none"> • Commitment towards appropriate privacy statement; • Roles and responsibilities of Horizon Power's key stakeholders; 	The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>updated to reflect AS/NZS 10002:2014 (currently, references AS/NZS 10002:2006). Specifically, the following items are not captured:</p> <ul style="list-style-type: none"> • Commitment towards appropriate privacy statement; • Roles and responsibilities of Horizon Power's key stakeholders; • Definition of continuous improvement and internal reporting practices, including root cause analysis and trend monitoring; • Information to be provided to the complainants; and • Training 	<ul style="list-style-type: none"> • Definition of continuous improvement and internal reporting practices, including root cause analysis and trend monitoring; • Information to be provided to the complainants; and • Training 	
18/2023	<p>B/2 Obligation No. 307 B Code of Conduct (2022), clause 91(2)</p> <p>The Family Violence Policy does not include a requirement that a vulnerable customer should be advised about the consequences of being named on the account of a residential customer who is not vulnerable.</p>	<p>Horizon Power should review and update the Family Violence Policy as per the Code of Conduct (2022) by including a requirement to advise a vulnerable customer about the consequences of being named on the account of a residential customer who is not vulnerable.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
19/2023	<p>A/2 Obligation No. 319 Electricity Industry Metering Code, clause 3.1</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter</p>	<p>The recommendation is an ongoing process and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	<p>reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>	
20/2023	<p>A/2 Obligation No. 326 Electricity Industry Metering Code, clause 3.5 (1) and (2) Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>	<p>The recommendation is an ongoing process and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
21/2023	<p>A/2 Obligation No. 327 Electricity Industry</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as</p>	<p>The recommendation is an ongoing process</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>Metering Code, clause 3.5 (3)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 14 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	<p>possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>	<p>and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
22/2023	<p>A/2 Obligation No. 333 Electricity Industry Metering Code, clause 3.9 (3)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters,</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>	<p>The recommendation is an ongoing process and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>		
23/2023	<p>A/2 Obligation No.341 Electricity Industry Metering Code, clause 3.11A (2)</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Reports. There are 16 active revenue meters and 18 long term inactive disconnected meters across the Horizon Power network which do not comply with the requirements of the National Measurement Act and applicable Metrology procedure. Horizon Power continues to make effort to gain access to these meters, however in many cases the only opportunity for these meters to be changed is when there is a change in owner/tenant.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e., possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI (Advanced Metering Infrastructure) meters.</p>	<p>The recommendation is an ongoing process and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>
24/2023	<p>B/2 Obligation No. 423 Electricity Industry Metering Code, clause 5.22(2)</p> <p>During our testing we observed that Horizon Power has installed six (6) check meters for major customer accounts. However, there is no process implemented to use check metering data to validate the energy data of</p>	<p>Horizon Power should document and implement a process to use check metering data, where available, to validate revenue meter energy data with check meter energy data.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan for the 2023 Audit.</p>

Rec. Reference #	Non-compliance/controls improvement	Auditor's recommendations	Action taken by the licensee by end of Audit period
	<p>revenue metering installations and to enhance the quality and reliability of the energy data. We acknowledge that there are other validation protocols configured within metering database platform (i.e. mData21) to confirm reliability of the revenue meter data.</p>		
25/2023	<p>C/2 Obligation No. 489 Electricity Industry (Licence Conditions) Regulations, regulation 7</p> <p>Horizon Power is required to report the amount of renewable source electricity purchased and cost of purchasing distributed under approved contracts after the end of each financial year to the coordinator (EPWA-Energy Policy WA)</p> <p>Through interviews with the Customer Service and Community Senior Manager we noted that the annual report covering the above-mentioned details as per regulation 7 of the Electricity Industry (Licence Conditions) Regulations, was not submitted and could not be provided for the purpose of compliance testing.</p>	<p>Horizon Power should prepare and submit a report covering the following items to the EPWA (coordinator):</p> <ul style="list-style-type: none"> • the amount of renewable source electricity purchased and • the cost of purchasing that renewable source electricity <p>The reports submitted to the coordinator should be maintained for the purpose of maintaining an audit trail.</p>	<p>The recommendation has not been addressed and will be incorporated into the Post Audit Implementation Plan.</p>

2.10 Limitations

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the Performance Audit for the Licence. We agree that a copy of this report may be provided to the ERA for its information in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report. We accept no duty, responsibility or liability to any party, other than Horizon Power, in connection with the report or this engagement.

Our engagement provides reasonable assurance as defined in ASAE 3100. Reasonable assurance means a high but not absolute level of assurance. There are inherent limitations in any assurance engagement, and these include the use of testing, the inherent limitations of any internal control structure, and the fact that most assurance evidence is persuasive rather than conclusive.

Hence, because of the inherent limitations of any compliance procedure, it is possible that fraud, error or non-compliance may occur and not be detected. A reasonable assurance engagement is not designed to detect all instances of non-compliance, as the engagement is not performed continuously throughout the period and the procedures performed in respect of compliance are undertaken on a test basis.

The conclusion expressed in this report has been formed on the above basis and the steps outlined in the Audit Plan. Any projection of the evaluation of the level of compliance to future periods is subject to the risk that the systems may become inadequate because of changes in conditions, or that the degree of compliance with management procedures may deteriorate.

3. Compliance performance overview

The following tables summarise the assessments made during the Audit of Horizon Power's compliance and the adequacy of controls in place to manage compliance with the relevant obligations or conditions of the EIRL2.

Table 4 sets out the rating scale defined by the ERA in the Guidelines for the assessment of the level of compliance with the conditions of the EIRL2. For the highest possible compliance rating to be achieved, Horizon Power was required to demonstrate it has maintained mature processes and controls over the Audit Period to facilitate compliance with the relevant obligations.

Table 4: Compliance and controls adequacy rating scale

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 - No activity took place to exercise this obligation during the Audit Period and hence, assessment of control adequacy was not performed	N/R	Not-rated - No activity took place during the Audit Period and hence, assessment of compliance was not performed

Table 5 summarises the assessments made through this Audit on Horizon Power's compliance and the adequacy of controls in place to manage compliance with the obligations or conditions of the EIRL2.

Table 5: Compliance and controls rating scale summary

Controls rating	Compliance rating					Total
	1	2	3	4	N/R	
A	278	5				283
B	13	16	1	1	1	32
C		2				2
D						-
N/P					138	138
Total	291	23	1	1	139	455

Note: in accordance with the ERA Audit Guidelines, obligations assessed as being not applicable to Horizon Power's operations have not been included within this report. These not applicable obligations comprise of the obligations provided within the approved Audit Plan and one additional obligation identified within Section 2.6 'Deviation from the Audit Plan'.

Table 6 summarises specific assessments for each Licence obligation. The detailed findings, including relevant observations, recommendations and action plans have been presented in Section 4. Refer to Section 6 - Appendix A for further explanation of the Audit Priority (Priority) rating scale.

Table 6: Compliance and controls summary

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
72	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 4	✓					4	✓				
73	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	✓					4	✓				
74	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	✓					4	✓				
75	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 6	✓					4	✓				
76	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 7(1)	✓					4	✓				
77	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 8	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
77A.	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 12(1)	✓					4	✓					
79	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 5	✓					4	✓					
80	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 6	✓					4	✓					
81	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 7	✓					4	✓					
82	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 8	✓					4	✓					
83	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 9	✓					4	✓					
84	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 10	✓					4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
85	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 11	✓					4	✓					
86	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 12	✓					4	✓					
86A	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 12					✓	4						✓
87	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 13		✓				4		✓				
88	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 14	✓					4	✓					
89	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 15	✓					4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
90	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulations 16(1A), 16(2) and 34		✓				4		✓			
91	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 17	✓					4	✓				
92	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 18	✓					4	✓				
93	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 19	✓					4	✓				
94	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 20	✓					4	✓				
95	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 21	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
96	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 32	✓					4	✓				
97	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 33(2)	✓					4	✓				
98	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulations 33(3) and (4)					✓	4					✓
98A	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 34A					✓	4					✓
98B	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 34B		✓				4		✓			
98C	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 34C	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating						
			A	B	C	D	N/P		1	2	3	4	N/R		
99	Integrated Regional Licence, condition 6.2.1	Electricity Industry (Customer Contracts) Regulations, regulation 36						✓	4						✓
100	Integrated Regional Licence, condition 6.8.1	Electricity Industry (Customer Contracts) Regulations, regulation 38						✓	4						✓
101	Integrated Regional Licence, condition 5.3.1	Electricity Industry Act, section 13(1)	✓						4	✓					
102	Integrated Regional Licence, condition 5.1.1	Electricity Industry Act, section 14(1)(a)	✓						4	✓					
103	Integrated Regional Licence, condition 5.1.2 and 5.1.3	Electricity Industry Act, section 14(1)(b)						✓	2						✓
104	Integrated Regional Licence, condition 5.1.4	Electricity Industry Act, section 14(1)(c)	✓						4	✓					
105	Integrated Regional Licence, condition 4.2.1	Economic Regulation Authority (Licensing Funding) Regulations 2014	✓						4	✓					
106	Integrated Regional Licence, condition 4.1.1	Electricity Industry Act, section 31(3)	✓						5	✓					
107	Integrated Regional Licence, condition 4.1.1	Electricity Industry Act, section 41(6)	✓						4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
108	Integrated Regional Licence, condition 6.4.1	Electricity Industry Act, section 54(1)	✓					4	✓				
109	Integrated Regional Licence, condition 6.6.1	Electricity Industry Act, section 54(2)	✓					4	✓				
111	Integrated Regional Licence, 6.1.1	Electricity Industry Act, section 101	✓					4	✓				
114	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 6.3.1</i>					✓	4					✓
116	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.4.2	✓					5	✓				
117	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 6.4.3</i>	✓					5	✓				
118	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 6.5.1</i>	✓					4	✓				
119	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 4.3.1</i>	✓					4	✓				
120	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 5.2.4</i>					✓	4					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
121	Electricity Industry Act, section 1	<i>Integrated Regional Licence, condition 5.3.2</i>	✓					4	✓				
122	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 5.1.5</i>	✓					4	✓				
123	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 4.4.1</i>					✓	4					✓
124	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 4.5.1</i>			✓			2		✓			
125	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 3.8.1 and 3.8.2</i>	✓					4	✓				
126	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 3.7.1</i>	✓					4	✓				
127	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 6.9.1</i>	✓					2	✓				
128	Electricity Industry Act, section 11	<i>Integrated Regional Licence, condition 6.9.3</i>					✓	2					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating						
			A	B	C	D	N/P		1	2	3	4	N/R		
129 A	Electricity Industry Act, section 82	Code of Conduct, clause 8 Integrated Regional Licence, condition 6.3.1						✓	4						✓
130	Electricity Industry Act, section 82	Code of Conduct, clause 9(1) <i>Integrated Regional Licence, condition 6.3.1</i>	✓						4	✓					
131	Electricity Industry Act, section 82	Code of Conduct, clause 9(2) Integrated Regional Licence, condition 6.3.1	✓						4	✓					
132	Electricity Industry Act, section 82	Code of Conduct, clause 10(1) Integrated Regional Licence, condition 6.3.1		✓					4		✓				
133	Electricity Industry Act, section 82	Code of Conduct, clause 10(2) Integrated Regional Licence, condition 6.3.1	✓						4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
133 A	Electricity Industry Act, section 82	Code of Conduct, clause 10(3) Integrated Regional Licence, condition 6.3.1	✓					4	✓					
134	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(4) Integrated Regional Licence, condition 6.3.1	✓					4	✓					
135	Electricity Industry Act, section 82	Code of Conduct, clause 10(5) Integrated Regional Licence, condition 6.3.1		✓				3		✓				
136	Electricity Industry Act, section 82	Code of Conduct, clause 11(1) Integrated Regional Licence, condition 6.3.1	✓					4	✓					
137	Electricity Industry Act, section 82	Code of Conduct, clause 11(2) Integrated Regional Licence, condition 6.3.1	✓					4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
138	Electricity Industry Act, section 82	Code of Conduct, clause 12(1) Integrated Regional Licence, condition 6.3.1					✓	4					✓
139	Electricity Industry Act, section 82	Code of Conduct, clause 12(2) Integrated Regional Licence, condition 6.3.1					✓	4					✓
140	Electricity Industry Act, section 82	<i>Code of Conduct, clause 13</i>					✓	4					✓
141	Electricity Industry Act, section 82	Code of Conduct, clause 2.9 Integrated Regional Licence, condition 6.3.1					✓	4					✓
142	Electricity Industry Act, section 82	Code of Conduct, clause 2.10 Integrated Regional Licence, condition 6.3.1					✓	4					✓
145	Electricity Industry Act, section 82	Code of Conduct, clause 19(1)	✓					1	✓				
146	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(1)					✓	4					✓
146 A	Electricity Industry Act, section 82	Code of Conduct, clause 20(1)					✓	4					✓
147	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(2)					✓	4					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
148	Electricity Industry Act, section 82	Code of Conduct, clause 20(3)					✓	4					✓
149	Electricity Industry Act, section 82	Code of Conduct, clause 20(4)					✓	4					✓
150	Electricity Industry Act, section 82	Code of Conduct, clause 20(5)					✓	4					✓
151	Electricity Industry Act, section 82	Code of Conduct, clause 20(6)					✓	4					✓
154	Electricity Industry Act, section 82	Code of Conduct, clause 4.4	✓					4	✓				
155	Electricity Industry Act, section 82	Code of Conduct, clause 4.5(1)	✓					4	✓				
155 A	Electricity Industry Act, section 82	Code of Conduct, clause 21(1)	✓					2	✓				
156	Electricity Industry Act, section 82	Code of Conduct, clause 21(9)	✓					2	✓				
157	Electricity Industry Act, section 82	Code of Conduct, clause 4.6	✓					4	✓				
157 A	Electricity Industry Act, section 82	Code of Conduct, clause 22(1)	✓					4	✓				
157 B	Electricity Industry Act, section 82	Code of Conduct, clause 22(2)					✓	4					✓
158	Electricity Industry Act, section 82	Code of Conduct, clause 22(3)	✓					4	✓				
158 A	Electricity Industry Act, section 82	Code of Conduct, clause 22(4)	✓					4	✓				
159	Electricity Industry Act, section 82	Code of Conduct, clause 4.8(1)	✓					4	✓				
160	Electricity Industry Act, section 82	Code of Conduct, clause 23(1)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
161	Electricity Industry Act, section 82	Code of Conduct, clause 23(2)	✓					4	✓				
162	Electricity Industry Act, section 82	Code of Conduct, clause 4.9	✓					4	✓				
163	Electricity Industry Act, section 82	Code of Conduct, clause 24(2)					✓	5					✓
165	Electricity Industry Act, section 82	Code of Conduct, clause 4.11(2)					✓	4					✓
166	Electricity Industry Act, section 82	Code of Conduct, clause 25(2)	✓					4	✓				
166 A	Electricity Industry Act, section 82	Code of Conduct, clause 25(3)	✓					4	✓				
167	Electricity Industry Act, section 82	Code of Conduct, clause 26(2)	✓					4	✓				
168	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(1)	✓					5	✓				
169	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(2)	✓					4	✓				
170	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(3)					✓	4					✓
171	Electricity Industry Act, section 82	Code of Conduct, clause 27(1)	✓					4	✓				
172	Electricity Industry Act, section 82	Code of Conduct, clause 27(2)(a)	✓					4	✓				
173	Electricity Industry Act, section 82	Code of Conduct, clause 27(2)(b)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
174	Electricity Industry Act, section 82	Code of Conduct, clause 27(3)	✓					4	✓				
175	Electricity Industry Act, section 82	Code of Conduct, clause 27(4)	✓					4	✓				
175 A	Electricity Industry Act, section 82	Code of Conduct, clause 28(1)	✓					4	✓				
175 B	Electricity Industry Act, section 82	Code of Conduct, clause 28(3)					✓	4					✓
176	Electricity Industry Act, section 82	Code of Conduct, clause 29(1)					✓	4					✓
177	Electricity Industry Act, section 82	Code of Conduct, clause 30(1)					✓	5					✓
178	Electricity Industry Act, section 82	Code of Conduct, clause 30(2)					✓	4					✓
179	Electricity Industry Act, section 82	Code of Conduct, clause 30(3)					✓	5					✓
180	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(6)					✓	3					✓
181	Electricity Industry Act, section 82	Code of Conduct, clause 30(6)					✓	4					✓
181 A	Electricity Industry Act, section 82	Code of Conduct, clause 30(7)					✓	5					✓
181 B	Electricity Industry Act, section 82	Code of Conduct, clause 30(8)					✓	5					✓
182	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(1)	✓					4	✓				
183	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(2)	✓					5	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
183 A	Electricity Industry Act, section 82	Code of Conduct, clause 31(1)	✓					4	✓					
183 B	Electricity Industry Act, section 82	Code of Conduct, clause 31(2)	✓					4	✓					
183 C	Electricity Industry Act, section 82	Code of Conduct, clause 31(3)	✓					4	✓					
183 D	Electricity Industry Act, section 82	Code of Conduct, clause 31(4)					✓	4						✓
183E	Electricity Industry Act, section 82	Code of Conduct, clause 31(5)	✓					4	✓					
184	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(3)	✓					2	✓					
184 A	Electricity Industry Act, section 82	Code of Conduct, clause 32(1)	✓					5	✓					
185	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(4)					✓	5						✓
186	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(7)					✓	5						✓
187	Electricity Industry Act, section 82	Code of Conduct, clause 33	✓					4	✓					
188	Electricity Industry Act, section 82	Code of Conduct, clause 34(1)	✓					4	✓					
189	Electricity Industry Act, section 82	Code of Conduct, clause 5.3	✓					4	✓					
190	Electricity Industry Act, section 82	Code of Conduct, clause 35(1) to (3)	✓					4	✓					
190 A	Electricity Industry Act, section 82	Code of Conduct, clause 35(4) to (6)	✓					4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
191	Electricity Industry Act, section 82	Code of conduct, clause 5.5	✓					4	✓				
191 A	Electricity Industry Act, section 82	Code of conduct, clause 36	✓					4	✓				
192	Electricity Industry Act, section 82	Code of Conduct, clause 37(1)	✓					4	✓				
193	Electricity Industry Act, section 82	Code of Conduct, clause 37(2)	✓					4	✓				
193 A	Electricity Industry Act, section 82	Code of Conduct, clause 37(3)	✓					4	✓				
194	Electricity Industry Act, section 82	Code of Conduct, clause 37(3)	✓					4	✓				
195	Electricity Industry Act, section 82	Code of Conduct, clause 37(5)	✓					4	✓				
196	Electricity Industry Act, section 82	Code of Conduct, clause 37(6)	✓					3	✓				
197	Electricity Industry Act, section 82	Code of Conduct, clause 38(1)	✓					2	✓				
198	Electricity Industry Act, section 82	Code of Conduct, clause 38(2)	✓					4	✓				
199	Electricity Industry Act, section 82	Code of Conduct, clause 38(4)	✓					4	✓				
200	Electricity Industry Act, section 82	Code of Conduct, clause 39(1)	✓					4	✓				
201	Electricity Industry Act, section 82	Code of Conduct, clause 39(2)	✓					4	✓				
201 A.	Electricity Industry Act, section 82	Code of Conduct, clause 39(3)	✓					5	✓				
202	Electricity Industry Act, section 82	Code of Conduct, clause 40(1)	✓					2	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
203	Electricity Industry Act, section 82	Code of Conduct, clause 40(3)	✓					4	✓				
204	Electricity Industry Act, section 82	Code of Conduct, clause 40(4)	✓					2	✓				
204 A	Electricity Industry Act, section 82	Code of Conduct, clause 40(5)					✓	4					✓
205	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(1)					✓	2					✓
206	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(2)					✓	2					✓
207	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(3)	✓					2	✓				
208	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(4)	✓					3	✓				
209	Electricity Industry Act, section 82	Code of Conduct, clause 6.3(1)(a)		✓				1		✓			
210	Electricity Industry Act, section 82	Code of Conduct, clause 6.3(1)(b)	✓					2	✓				
211	Electricity Industry Act, section 82	Code of Conduct, clause 41(1)(a)		✓				1		✓			
212	Electricity Industry Act, section 82	Code of Conduct, clause 41(1)(b)	✓					2	✓				
212 A	Electricity Industry Act, section 82	Code of Conduct, clause 41(3)	✓					4	✓				
213	Electricity Industry Act, section 82	Code of Conduct, clause 43(1)	✓					1	✓				
213 A	Electricity Industry Act, section 82	Code of Conduct, clause 43(2)		✓				4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
214	<i>Electricity Industry Act, section 82</i>	Code of Conduct, clause 43(5)		✓				1		✓			
214 A	Electricity Industry Act, section 82	Code of Conduct, clause 44(1)					✓	4					✓
214 B	Electricity Industry Act, section 82	Code of Conduct, clause 44(3)					✓	4					✓
214 C	Electricity Industry Act, section 82	Code of Conduct, clause 44(4)					✓	4					✓
214 D	Electricity Industry Act, section 82	Code of Conduct, clause 44(5)					✓	4					✓
214E	Electricity Industry Act, section 82	Code of Conduct, clause 44(6)					✓	4					✓
215	Electricity Industry Act, section 82	Code of Conduct, clause 45(1)	✓					4	✓				
216	Electricity Industry Act, section 82	Code of Conduct, clause 45(2)	✓					2	✓				
217	Electricity Industry Act, section 82	Code of Conduct, clause 6.7	✓					3	✓				
218	Electricity Industry Act, section 82	Code of Conduct, clause 45(3)		✓				2		✓			
219	Electricity Industry Act, section 82	Code of Conduct, clause 6.9(1)	✓					2	✓				
220	Electricity Industry Act, section 82	Code of Conduct, clause 46(1)	✓					4	✓				
221	Electricity Industry Act, section 82	Code of Conduct, clause 46(2)	✓					2	✓				
222	Electricity Industry Act, section 82	Code of Conduct, clause 46(3)	✓					2	✓				
223	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(4)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
223 A	Electricity Industry Act, section 82	Code of Conduct, clause 46(4)					✓	2					✓
223 B	Electricity Industry Act, section 82	Code of Conduct, clause 46(5)					✓	2					✓
225	Electricity Industry Act, section 82	Code of Conduct, clause 46(6)					✓	2					✓
226	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(7)	✓					4	✓				
227	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(8)					✓	4					✓
228	Electricity Industry Act, section 82	Code of Conduct, clause 47	✓					4	✓				
229	Electricity Industry Act, section 82	Code of Conduct, clause 48		✓				3		✓			
230	Electricity Industry Act, section 82	Code of Conduct, clause 49(a)	✓					4	✓				
232	Electricity Industry Act, section 82	Code of Conduct, clause 51(2)	✓					4	✓				
232 A	Electricity Industry Act, section 82	Code of Conduct, clause 51(4)	✓					4	✓				
233	Electricity Industry Act, section 82	Code of Conduct, clause 7.5	✓					4	✓				
234	Electricity Industry Act, section 82	Code of Conduct, clause 52	✓					1	✓				
235	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(1)	✓					2	✓				
236	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(2)		✓				2					✓
237	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(3)					✓	2					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
238	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(4)		✓				1				✓	
238 A	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(4A)					✓	3					✓
239	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(5)					✓	3					✓
240	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(6)		✓				3		✓			
241	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(7)	✓					3	✓				
242	Electricity Industry Act, section 82	Code of Conduct, clause 53(2)	✓					2	✓				
244	Electricity Industry Act, section 82	Code of Conduct, clause 54(1)					✓	4					✓
245	Electricity Industry Act, section 82	Code of Conduct, clause 9.2(1)	✓					4	✓				
246	Electricity Industry Act, section 82	Code of Conduct, clause 56(1)	✓					4	✓				
247	Electricity Industry Act, section 82	Code of Conduct, clause 56(2)	✓					3	✓				
249	Electricity Industry Act, section 82	Code of Conduct, clause 57(1)					✓	3					✓
250	Electricity Industry Act, section 82	Code of Conduct, clause 57(2)	✓					3	✓				
251	Electricity Industry Act, section 82	Code of Conduct, clause 57(3)	✓					3	✓				
252	Electricity Industry Act, section 82	Code of Conduct, clause 57(4)					✓	3					✓
253	Electricity Industry Act, section 82	Code of Conduct, clause 57(5)					✓	3					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
254	Electricity Industry Act, section 82	Code of Conduct, clause 9.4(1)					✓	4					✓
254 A	Electricity Industry Act, section 82	Code of Conduct, clause 58(1)					✓	4					✓
255	Electricity Industry Act, section 82	Code of Conduct, clause 58(2)					✓	4					✓
255 A	Electricity Industry Act, section 82	Code of Conduct, clause 58(4)	✓					4	✓				
257	Electricity Industry Act, section 82	Code of Conduct, clause 59(1)	✓					2	✓				
259	Electricity Industry Act, section 82	Code of Conduct, clause 9.6	✓					4	✓				
259 A	Electricity Industry Act, section 82	Code of Conduct, clause 60(1)	✓					3	✓				
259 B	Electricity Industry Act, section 82	Code of Conduct, clause 60(3)		✓				3			✓		
259 C	Electricity Industry Act, section 82	Code of Conduct, clause 60(5)	✓					3	✓				
260	Electricity Industry Act, section 82	Code of Conduct, clause 61(a), (b) and (d)	✓					3	✓				
261	Electricity Industry Act, section 82	Code of Conduct, clause 62	✓					3	✓				
262	Electricity Industry Act, section 82	Code of Conduct, clause 63(1)					✓	3					✓
263	Electricity Industry Act, section 82	Code of Conduct, clause 63(2)					✓	3					✓
264	Electricity Industry Act, section 82	Code of Conduct, clause 63(4)					✓	3					✓
265	Electricity Industry Act, section 82	Code of Conduct, clause 64	✓					3	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
266	Electricity Industry Act, section 83	Code of Conduct, clause 65(1)					✓	5					✓
267	Electricity Industry Act, section 82	Code of Conduct, clause 65(2)					✓	3					✓
268	Electricity Industry Act, section 82	Code of Conduct, clause 65(3)					✓	5					✓
269	Electricity Industry Act, section 82	Code of Conduct, clause 65(6)					✓	3					✓
270	Electricity Industry Act, section 82	Code of Conduct, clause 9.11(1)					✓	4					✓
271	Electricity Industry Act, section 82	Code of Conduct, clauses 66(2)					✓	5					✓
271 A	Electricity Industry Act, section 82	Code of Conduct, clauses 66(3)		✓				3	✓				
271 B	Electricity Industry Act, section 82	Code of Conduct, clauses 66(5)					✓	3					✓
271 C	Electricity Industry Act, section 82	Code of Conduct, clauses 67(2)	✓					3	✓				
271 D	Electricity Industry Act, section 82	Code of Conduct, clauses 68(1)	✓					3	✓				
271E	Electricity Industry Act, section 82	Code of Conduct, clauses 68(3)					✓	3					✓
271F	Electricity Industry Act, section 82	Code of Conduct, clauses 68(4)	✓					3	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
272	Electricity Industry Act, section 82	Code of Conduct, clauses 10.1(1)	✓					4	✓					
273	Electricity Industry Act, section 82	Code of Conduct, clause 69	✓					4	✓					
273 A	Electricity Industry Act, section 82	Code of Conduct, clauses 70(1), (2) and (3)	✓					4	✓					
274	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(3)	✓					4	✓					
275	Electricity Industry Act, section 82	Code of Conduct, clause 72(1)		✓				4	✓					
276	Electricity Industry Act, section 82	Code of Conduct, clause 72(2)		✓				4	✓					
277	Electricity Industry Act, section 82	Code of Conduct, clauses 10.2(3)	✓					4	✓					
278	Electricity Industry Act, section 82	Code of Conduct, clauses 10.2(3)	✓					4	✓					
279	Electricity Industry Act, section 82	Code of Conduct, clauses 10.3	✓					4	✓					
280	Electricity Industry Act, section 82	Code of Conduct, clause 73	✓					4	✓					
281	Electricity Industry Act, section 82	Code of Conduct, clauses 10.4	✓					4	✓					
282	Electricity Industry Act, section 82	Code of Conduct, clause 74		✓				4	✓					
283	Electricity Industry Act, section 82	Code of Conduct, clause 10.6		✓				4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
283 A	Electricity Industry Act, section 82	Code of Conduct, clause 75(1)		✓				4		✓			
283 B	Electricity Industry Act, section 82	Code of Conduct, clause 75(3)		✓				4	✓				
283 C	Electricity Industry Act, section 82	Code of Conduct, clause 75(4)		✓				4	✓				
283 D	Electricity Industry Act, section 82	Code of Conduct, clause 76					✓	4					✓
284	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(1)		✓				4	✓				
285	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(2)		✓				4	✓				
286	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(3)		✓				4	✓				
287	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(4)	✓					4	✓				
288	Electricity Industry Act, section 82	Code of Conduct, clause 10.8(1)	✓					4	✓				
290	Electricity Industry Act, section 82	Code of Conduct, clause 77	✓					5	✓				
291	Electricity Industry Act, section 82	Code of Conduct, clause 10.10(1)	✓					4	✓				
292	Electricity Industry Act, section 82	Code of Conduct, clause 10.10(1)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
294	Electricity Industry Act, section 82	Code of Conduct, clause 78(1)	✓					4	✓					
295	Electricity Industry Act, section 82	Code of Conduct, clause 78(2)	✓					4	✓					
296	Electricity Industry Act, section 82	Code of Conduct, clause 79(1)	✓					4	✓					
297	Electricity Industry Act, section 82	Code of Conduct, clause 79(2)	✓					4	✓					
297 A	Electricity Industry Act, section 82	Code of Conduct, clause 80	✓					3	✓					
297 B	Electricity Industry Act, section 82	Code of Conduct, clause 82(2)	✓					2	✓					
297 C	Electricity Industry Act, section 82	Code of Conduct, clause 82(3)	✓					3	✓					
297 D	Electricity Industry Act, section 82	Code of Conduct, clause 83(5)					✓	2						✓
297F	Electricity Industry Act, section 82	Code of Conduct, clause 84(1)	✓					2	✓					
297 G	Electricity Industry Act, section 82	Code of Conduct, clause 84(3)	✓					3	✓					
297I	Electricity Industry Act, section 82	Code of Conduct, clause 85(2)					✓	3						✓
297J	Electricity Industry Act, section 82	Code of Conduct, clause 86(2)	✓					3	✓					
297 K	Electricity Industry Act, section 82	Code of Conduct, clause 86(3)					✓	3						✓
297L	Electricity Industry Act, section 82	Code of Conduct, clause 86(6)					✓	3						✓
297 M	Electricity Industry Act, section 82	Code of Conduct, clause 86(7)					✓	3						✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
297 N	Electricity Industry Act, section 82	Code of Conduct, clause 86(8)					✓	3					✓
298	Electricity Industry Act, section 82	Code of Conduct, clause 87(1)	✓					4	✓				
299	Electricity Industry Act, section 82	Code of Conduct, clause 87(2)		✓				4		✓			
299 A	Electricity Industry Act, section 82	Code of Conduct, clause 87(3)		✓				4		✓			
300	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(3)	✓					4	✓				
301	Electricity Industry Act, section 82	Code of Conduct, clause 88	✓					4	✓				
301 A	Electricity Industry Act, section 82	Code of Conduct, clause 89	✓					4	✓				
302	Electricity Industry Act, section 82	Code of Conduct, clause 12.2	✓					4	✓				
303	Electricity Industry Act, section 82	Code of Conduct, clause 12.3	✓					4	✓				
304	Electricity Industry Act, section 82	Code of Conduct, clause 90					✓	4					✓
305	Electricity Industry Act, section 82	Code of Conduct, clause 13.1	✓					4	✓				
306	Electricity Industry Act, section 82	Code of Conduct, clause 13.2	✓					4	✓				
307	Electricity Industry Act, section 82	Code of Conduct, clause 13.3	✓					4	✓				
307 A	Electricity Industry Act, section 82	Code of Conduct, clause 91(1)	✓					4	✓				
307 B	Electricity Industry Act, section 82	Code of Conduct, clause 91(2)		✓				4		✓			

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
307 C	Electricity Industry Act, section 82	Code of Conduct, clause 91(3)	✓					4	✓					
307 D	Electricity Industry Act, section 82	Code of Conduct, clause 91(5)					✓	4						✓
307E	Electricity Industry Act, section 82	Code of Conduct, clause 91(6)	✓					4	✓					
307F	Electricity Industry Act, section 82	Code of Conduct, clause 92	✓					2	✓					
307 G	Electricity Industry Act, section 82	Code of Conduct, clause 93	✓					4	✓					
308	Electricity Industry Act, section 82	Code of Conduct, clause 14.1(1)	✓					4	✓					
308 A	Electricity Industry Act, section 82	Code of Conduct, clause 94(1)	✓					4	✓					
308 B	Electricity Industry Act, section 82	Code of Conduct, clause 94(2)	✓					4	✓					
310	Electricity Industry Act, section 82	Code of Conduct, clause 95(1)	✓					4	✓					
312	Electricity Industry Act, section 82	Code of Conduct, clause 96					✓	4						✓
313	Electricity Industry Act, section 82	Code of Conduct, clause 14.4(1)					✓	4						✓
313 A	Electricity Industry Act, section 82	Code of Conduct, clause 97(1) & (2)	✓					4	✓					
314	Electricity Industry Act, section 82	Code of Conduct, clause 14.5	✓					4	✓					
314 A	Electricity Industry Act, section 82	Code of Conduct, clause 98(1) and (2)					✓	4						✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
315	Electricity Industry Act, section 82	Code of Conduct, clause 100(1)	✓					4	✓				
316	Electricity Industry Act, section 82	Code of Conduct, clause 100(2)	✓					4	✓				
319	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.1	✓					1		✓			
320	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.2(1)	✓					4	✓				
321	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(1)	✓					4	✓				
322	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(3)	✓					4	✓				
323	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3A(1)	✓					4	✓				
324	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3B					✓	4					✓
325	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3C	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
326	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(1) and (2)	✓					1		✓			
327	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(3)	✓					1		✓			
328	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(4)	✓					4	✓				
329	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(6)	✓					4	✓				
330	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(9)	✓					2	✓				
331	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.7	✓					4	✓				
332	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.8	✓					4	✓				
333	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(3)	✓					1		✓			
334	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(7)	✓					2	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
335	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(9)					✓	4					✓
336	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.10	✓					4	✓				
337	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(1)	✓					2	✓				
338	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(2)					✓	4					✓
339	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(3)					✓	4					✓
340	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(1)	✓					2	✓				
341	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(2)	✓					1		✓			
342	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(1)	✓					4	✓				
343	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(2)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
344	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(3)	✓					4	✓				
345	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(4)	✓					4	✓				
346	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(1)					✓	4					✓
347	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(3)(c)	✓					4	✓				
348	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(4)	✓					4	✓				
349	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.14(3)					✓	2					✓
355	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(1)					✓	4					✓
356	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(3)					✓	4					✓
357	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(1)	✓					2	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
358	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(2)	✓					4	✓				
359	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.22	✓					4	✓				
360	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(a)	✓					4	✓				
361	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(b)					✓	4					✓
362	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24A(1)					✓	4					✓
363	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24B(1)					✓	4					✓
364	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.27					✓	4					✓
365	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.29					✓	4					✓
366	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(1)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
367	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(2)	✓					4	✓				
368	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(3)					✓	4					✓
370	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.3(1)	✓					3	✓				
371	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.4(1)					✓	5					✓
374	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.6(1)					✓	4					✓
375	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.6(2)					✓	4					✓
376	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.7(1)					✓	4					✓
377	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(3)					✓	4					✓
378	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(3A)					✓	4					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
379	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(a)	✓					4	✓				
380	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(b)	✓					4	✓				
381	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(5)	✓					4	✓				
382	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.9	✓					4	✓				
383	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1 (1)					✓	5					✓
384	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1(2)					✓	5					✓
385	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.3(1)	✓					4	✓				
385 A	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.3(2)	✓					4	✓				
386	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.4(1)	✓					2	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
387	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.4(1A)	✓					2	✓				
389	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2)	✓					4	✓				
390	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2A)	✓					4	✓				
391	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(1)	✓					4	✓				
391 A.	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(3)					✓	4					✓
391 B.	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(5)					✓	4					✓
392	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.7					✓	4					✓
393	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.8	✓					4	✓				
394	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.9					✓	4					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
395	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.10					✓	4					✓
397	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.12(1)					✓	4					✓
398	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.13					✓	4					✓
399	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.14(3)					✓	4					✓
400	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.15	✓					4	✓				
401	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.16					✓	4					✓
402	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17(1)					✓	4					✓
403	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(1)	✓					4	✓				
404	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(3)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
409	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.19(5)					✓	4					✓
411	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(1)	✓					4	✓				
412	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(2)	✓					4	✓				
413	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(4)					✓	4					✓
414	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(2)					✓	4					✓
415	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(4)					✓	4					✓
418	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(8)					✓	4					✓
419	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(9)					✓	4					✓
420	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(11)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
421	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(12)					✓	4					✓
422	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(1)	✓					4	✓				
423	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(2)		✓				4		✓			
424	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(3)	✓					4	✓				
425	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(4)					✓	4					✓
426	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(5)	✓					4	✓				
427	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(6)	✓					4	✓				
428	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(1)	✓					4	✓				
429	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(3)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
430	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(1)	✓					4	✓				
431	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(2)					✓	4					✓
432	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(3)					✓	4					✓
433	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(4)					✓	4					✓
434	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.25	✓					4	✓				
447	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.1(1)	✓					2	✓				
448 A.	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.2	✓					5	✓				
448 B.	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.18	✓					5	✓				
448 C	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.19A(1)	✓					5	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
448 D	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.19B(1)					✓	5					✓
449	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(4)	✓					5	✓				
450	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(5)	✓					4	✓				
452	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 7.2(2)					✓	4					✓
457	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(1)					✓	5					✓
458	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(2)					✓	5					✓
459	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(3)					✓	5					✓
460	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(4)					✓	4					✓
461	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.3(2)					✓	5					✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
462	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	✓					5	✓					
463	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8		✓				5	✓					
464	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	✓					5	✓					
465	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	✓					5	✓					
466	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	✓					5	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
467	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 12(3)	✓					4	✓					
468	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	✓					5	✓					
469	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	✓					4	✓					
470	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)					✓	4						✓
471	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)					✓	4						✓

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating						
			A	B	C	D	N/P		1	2	3	4	N/R		
472	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18						✓	4						✓
473	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19	✓						2	✓					
474	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	✓						4	✓					
475	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(2)	✓						4	✓					
476	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	✓						4	✓					

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
477	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)		✓				5	✓				
478	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	✓					4	✓				
479	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	✓					4	✓				
480	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	✓					4	✓				
481	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(2)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
482	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	✓					4	✓				
483	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(1) and (2)	✓					4	✓				
483 A.	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	✓					4	✓				
483 B.	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	✓					4	✓				
484	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating				
			A	B	C	D	N/P		1	2	3	4	N/R
485	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	✓					4	✓				
486	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.1	Electricity Industry (Licence Conditions) Regulations, regulation 8	✓					4	✓				
487	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.6	Electricity Industry (Licence Conditions) Regulations, regulation 8					✓	4					✓
488	Horizon Power Integrated Regional Licence, Schedule 1, conditions 3.1 and 3.2	Electricity Industry (Licence Conditions) Regulations, regulation 6	✓					4	✓				
489	Horizon Power Integrated Regional Licence, Schedule 1, condition 3.3	Electricity Industry (Licence Conditions) Regulations, regulation 7			✓			4		✓			
496	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 40	✓					4	✓				
497	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(a)	✓					4	✓				

No.	Relevant acts and code	Licence obligation	Controls adequacy					Priority	Compliance rating					
			A	B	C	D	N/P		1	2	3	4	N/R	
498	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(b)	✓					4	✓					
499	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(c)	✓					4	✓					
500	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(d)	✓					4	✓					
501	Horizon Power Integrated Regional Licence, condition 4.1.1	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(e)	✓					4	✓					

4. Previous audit non-compliances and recommendations

The following tables summarises the implementation status of the previous performance audit non-compliances and recommendations.

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
Resolved during the current audit period				
02/2020	<p>Non-compliance rating: B/2 Compliance Obligation: 135</p> <p>Details: NSC (Non Standard Contract) call scripts noted that the information specified under sub clause 2(b)-(j) and sub clause 4 is provided to customers after verifiable consent have been obtained.</p>	Horizon Power to ensure information specified under sub clause 2(b)-(j) is provided to customers prior to obtaining their consent and to reflect this process as part of Horizon Power's NSC call scripts.	05/2020	No
05/2020	<p>Non-compliance rating: B/2 Compliance Obligation no. 229</p> <p>Details: The standard disconnection notice template did not include a reference to the complaint handling process, contact number and option to access the Electricity Ombudsman.</p>	Horizon Power to include reference to the Electricity Ombudsman and contact number for the Electricity Ombudsman in the disconnection warning template.	06/2020	No
13/2020	<p>Non-compliance Rating: B/2 Compliance Obligation: 370</p> <p>Details: It was identified during testing that mData21 does not contain all standing data items required under</p>	Horizon Power to finalise draft Communication Rules to remove, modify or add any requirement in clause 4.3(1) for standing data that is currently omitted from mData21.	01/2022	No

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
	Table 2 'Description and designated source of standing data to be contained in the registry.			
Unresolved during the current audit period				
01/2020	<p>Non-compliance rating: C/NR Compliance Obligation: 124</p> <p>Details: Horizon Power utilises Power BI and Velocity reporting to prepare the Annual Performance Reports, outlining CSC and network performance metrics, which are presented in the manner prescribed by the ERA. It was noted that the reporting is point in time and historical data is unable to be generated. Additionally, the source point in time data/reporting is not retained by the CSC Team to provide an audit trail to verify the accuracy and completeness of the Annual Performance Reports.</p>	Horizon Power CSC team to ensure supporting system reports generated at a point in time for the compilation of annual performance datasheets as well as reconciliation workings are properly maintained for the purpose of maintaining an audit trail.	No	<p>Yes</p> <p>Horizon Power CSC team should retain the source point in time data/reports used to prepare the Annual Performance Reports to provide an audit trail to verify the accuracy and completeness of information reported. It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
03/2020	<p>Controls improvement rating: B/2 Compliance Obligation no. 209</p> <p>Details: Horizon Power does not provide one-off additional time to pay</p>	Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties as part of their call scripts.	No	Horizon Power should assess and comply with Clause 41 requirements of Code of Conduct, 2022 by making available additional time to pay bills and payment plans for those customers experiencing payment difficulties. This requirement should also be added to

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
	<p>to all customers experiencing payment difficulty.</p> <p>We were advised that the options of 'additional time to pay a bill' or 'a payment plan for the amount owing' are provided to customers based on their past payment history, including any previous payment plan arrangement.</p>			<p>relevant call scripts.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
04/2020	<p>Non-compliance rating: B/2 Obligation no. 211</p> <p>Details: Horizon Power does not provide one-off additional time to pay to all customers experiencing payment difficulty.</p> <p>We were advised that the options of 'additional time to pay a bill' or 'a payment plan for the amount owing' are provided to customers based on their past payment history, including any previous payment plan arrangement.</p>	<p>Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties or financial hardship as part of their call scripts.</p>	No	<p>Horizon Power should assess and comply with Clause 41 of the Code of Conduct, 2022 requirements by making available additional time to pay bills and payment plans for those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
06/2020	<p>Non-compliance rating: B/2 Compliance Obligation: 240</p> <p>Details: Although Horizon Power has policies and procedures in place, they have not requested annual</p>	<p>Horizon Power should examine the current life support customer listing to ensure that:</p> <ul style="list-style-type: none"> all initial certification forms have been sent out to life support customers and returned with sign off by an appropriately 	No	<p>Horizon Power has started implementing the existing policy from January 2023 to request the annual confirmation and re-certification from existing and new life support customers every three years.</p> <p>The purpose of the process is to confirm that relevant</p>

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
	<p>confirmation, three (3) year re-certification or removed life support customers from the life support register during the reporting period.</p>	<p>qualified medical practitioner confirming life support requirement;</p> <ul style="list-style-type: none"> • annual confirmations with life support customers regarding the requirement of life support equipment (where applicable) are appropriately logged on Velocity; and • 3 year re-certification forms have been sent out to life support customers (where applicable) and returned with sign off by an appropriately qualified medical practitioner confirming life support requirement. <p>Additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation.</p> <p>In line with good practice, the returned forms should be retained electronically under the respective customer accounts for record keeping purposes.</p>		<p>information is received from all life support customers within the required timeframe as per the Code of Conduct, 2018 and 2022.</p> <p>An additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation. It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
07/2020	<p>Non-compliance Rating: B/2 Compliance Obligation: 241</p> <p>Although Horizon Power has policies and procedures in</p>	<p>Horizon Power should update the current life support customer register to ensure that life support customers are removed upon satisfaction of subclause 7.7(7)(a)(i), (ii)</p>	No	<p>Horizon Power should continue to focus on the implementation of the annual confirmation and re-certification from existing and new life support customers. In connection with this process, Horizon Power should then</p>

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
	<p>place, they have not requested annual confirmation, three (3) year re-certification or removed life support customers from the life support register during the reporting period.</p> <p>Through discussions we understand that Horizon Power has not removed details from the life support register for any life support customer until they have been advised by the customer that they no longer require life support.</p>	<p>or (iii) of the Code of Conduct.</p>		<p>review and update the life support register accordingly, including the removal of details for any customers who no longer require life support.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
08/2020	<p>Non-Compliance Rating: A/2 Compliance Obligation: 319</p> <p>Details: Horizon Power had 19 meters on its network which had not yet been exchanged.</p>	<p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>	No	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e. possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI meters.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
09/2020	<p>Non-compliance Rating: A/2 Compliance Obligation: 326</p>	<p>Horizon Power to continue working with the community to replace the remaining 19 non-</p>	No	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to</p>

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
	<p>Details: Horizon Power had 19 meters on its network which had not yet been exchanged.</p>	compliant meters.		<p>stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e. possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI meters.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
10/2020	<p>Non-compliance Rating: A/2 Compliance Obligation: 327 -</p> <p>Details: Horizon Power had 19 meters on its network which had not yet been exchanged.</p>	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	No	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e. possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI meters.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
11/2020	<p>Non-compliance Rating: A/2 Compliance Obligation: 333</p> <p>Details: Horizon Power had 19 meters on its network which had not yet been exchanged.</p>	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	No	<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e. possible improvements in energy meter</p>

Rec. ref #	Non-compliance / controls improvement	Recommendation	Date resolved	Further action required / detail of further action
				<p>reading, accuracy, etc.) of changing from conventional to AMI meters.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>
12/2020	<p>Non-compliance Rating: A/2 Compliance Obligation: 341 -</p> <p>Details: Horizon Power had 19 meters on its network which had not yet been exchanged.</p>	<p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>		<p>Horizon Power should continue to take reasonable steps to try and replace the 16 meters as early as possible to stay compliant with the Metering Code 2012. Future communication with the customer to exchange the meters should include advantages (i.e. possible improvements in energy meter reading, accuracy, etc.) of changing from conventional to AMI meters.</p> <p>It is to be noted that these actions were closed by HP in their PAIP (Post Audit Implementation Plan) update provided to the ERA in January 2020.</p>

5. Detailed findings and recommendations

Obligation no.	Obligation reference	Obligation description	Observation and findings		
72	Electricity Industry (Obligation to Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations, regulation 4	A distributor must attach, or connect, premises to a distribution system or provide a stand-alone power system for the supply of electricity to the premises if a retailer seeks to arrange with, or a customer applies to, the distributor to attach or connect the premises. The circumstances described in regulation 5(1) must be met for the distributor to be required to attach or connect the premises.	Priority: 4	Control adequacy: A	Compliance rating: 1
			<p>We performed walkthroughs with the Asset Services and Stand-alone Power System (SPS) team, and reviewed connection related governance documents, such as Western Australian Service and Installation Requirements (WASIR), Underground Distribution System (UDS) Manual, SPS Engagement Strategy, Connection request and Connection service order. Through our assessment, we noted that Horizon Power has established processes to attach, or connect, premises to a distribution system or provide a SPS for the supply of electricity to the premises if a customer applies to attach or connect the premises. These include:</p> <ul style="list-style-type: none"> Section 4.3 of UDS manual details out the roles and responsibilities of Horizon Power in connecting the premises to the distribution network, the manual details out the controls in connecting the systems with the network Section 3.6 of WASIR details about the process and procedures to connect to Horizon Power network (including safety, compliance, reliability). It also details out different applicable acts and regulation Horizon Power complies to in the process. Section 9.3 details out the charges applicable to connect to various types of customers in connecting to the network. <p>If an enquiry to connect the system to Horizon Power network is raised by a customer, Horizon Power prepares an estimate for both 'connecting to the existing grid' and 'SPS'. Upon consideration of safety and reliability standards as well as cost estimates, Horizon power connects the potential customer either with SPS or to suitable connection point.</p> <p>Through our examination of documents and testing one sample customer connection request, we noted that Horizon Power followed the established processes and therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
73	Electricity Industry (Obligation to Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must extend the distribution system to a suitable connection point.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>We performed walkthroughs with the Asset Services and Stand-alone Power System (SPS) team, and reviewed connection related governance documents, such as Western Australian Service and Installation Requirements (WASIR), Underground Distribution System (UDS) Manual, SPS Engagement Strategy, Connection request and Connection service order. Through our assessment, we noted that Horizon Power has established processes to attach, or connect, premises to a distribution system or provide a SPS for the supply of electricity to the premises if a customer applies to attach or connect the premises. These include:</p> <ul style="list-style-type: none"> Section 4.3 of UDS manual details out the roles and responsibilities of Horizon Power in connecting the premises to the distribution network, the manual details out the controls in connecting the systems with the network Section 3.6 of WASIR details about the process and procedures to connect to Horizon Power network (including safety, compliance, reliability). It also details out different applicable acts and regulation Horizon Power complies to in the process. Section 9.3 details out the charges applicable to connect to various types of customers in connecting to the network. <p>If an enquiry to connect the system to Horizon Power network is raised by a customer, Horizon Power prepares an estimate for both 'connecting to the existing grid' and 'SPS'. Upon consideration of safety and reliability standards as well as cost estimates, Horizon power connects the potential customer either with SPS or to suitable connection point.</p> <p>Through our examination of documents and testing one sample customer connection request, we noted that Horizon Power followed the established processes and therefore, Horizon Power has complied with this obligation.</p>		
74	Electricity Industry (Obligation to	The capacity and standard of an extension or a stand-alone power	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>We performed walkthroughs with the Asset Services and Stand-alone Power System (SPS) team, and reviewed connection related governance documents, such as Western Australian Service and</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings
	Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	system must be adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor.	<p>Installation Requirements (WASIR), Underground Distribution System (UDS) Manual, SPS Engagement Strategy, Connection request and Connection service order. Through our assessment, we noted that Horizon Power adheres to the following standards of an extension or a SPS system adequate for the supply required and in accordance with accepted good industry practice.</p> <ul style="list-style-type: none"> • WASIR 3.6 details out various standards Horizon Power follows to in connecting the customer to the network. It was observed that Horizon Power follows necessary regulations (as follows) in clear connection to the requirement of the obligation. • SPS engagement strategy 7.1 calls out various standards used in developing the document and procedures followed in implementing SPS at customer locations. <p>The manual provides standards and guidance for connections in accordance with accepted good practices, including:</p> <ul style="list-style-type: none"> • Western Australian Electrical Requirements (WAER) • Electricity Corporations Act 2005 • Electricity Act 1945 • Electricity (Licensing) Regulations 1991 • Electricity (Supply Standards and System Safety) Regulations 2001 • Electricity Industry Act 2004 • Code of conduct for the supply of electricity to small use customers 2018 • Electricity Industry (Obligation to Connect) Regulations 2005 • Electricity Industry Metering Code 2005 • Occupational Safety and Health Act 1984 • Occupational Safety and Health Regulations 1996 • National Standard for Construction Work • Mines Safety and Inspections Act 1994 • Mines Safety and Inspection Regulations 1995 • Energy Operators (Power's) Act 1979 • AS/CA S009 Installation requirements for customer cabling (Wiring rules) • AS 1289 Methods for testing soils for engineering purposes • AS/NZS 2053 Conduits and fittings for electrical installations • AS 2067 Substations and high voltage installations exceeding 1 kV a.c.

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> AS/NZS 3000 Wiring Rules AS/NZS 3835 Earth potential rise–Protection of telecommunications network users, personnel and plant AS/NZS 3845 Road safety barrier systems AS/NZS 4026 Electric cables–For underground residential distribution systems AS 4702 Polymeric cable protection covers AS/NZS 4853 Electrical hazards on metallic pipelines AS/NZS 3000: The Wiring Rules AS/NZS 7000: Overhead Line Design AS/NZS 61000: Electromagnetic Compatibility HB 264 Power Quality Electricity (Licensing) Regulations 1991 <p>Therefore, Horizon Power has complied with this obligation.</p>		
75	<p>Electricity Industry (Obligation to Connect) Regulations, regulation 3</p> <p>Electricity Industry (Obligation to Connect) Regulations, regulation 6</p>	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must do so within a defined timeframe.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the CSC and Metering Services team, we were informed that Horizon Power has controls in place to confirm the connections are completed with new premises within 20 business days.</p> <p>On review of the new connections process flow map, we noted that mData21 automatically generates a report each Monday, identifying new connections open greater than ten days. This report is reviewed by the regional teams to identify if the new connection is likely to exceed 20 days. If a new connection be deemed likely to exceed 20 days, the customer is shared with the 'Extended 20 Day New Connection Letter' that requires the customer's signature agreeing to an extension of the 20 days and a new revised connection day, complying with 6.(2)(b) of Electricity Industry (Obligation to Connect) Regulations. Through interviews, we were also informed that there were no reported breaches of Horizon Power failing to comply with the 20-business day connection time frame during the audit period.</p> <p>Based on interviews and review of documents, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			period.		
76	Electricity Industry (Obligation to Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations, regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, a review of the Move-in procedure and one sample for move-in for a new customer, we noted Horizon Power has controls in place to energise a premise if the premises are attached to a distribution system but are not energised in line with Electricity Industry (Obligation to Connect) Regulations, regulation 3 and Electricity Industry (Obligation to Connect) Regulations, regulation 7(1).</p> <p>As Horizon Power acts as both the retailer and distributor, where a request has been made by a customer, Horizon Power will connect an address if the premises is attached to the distribution network.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
77	Electricity Industry (Obligation to Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations,	A distributor that is obliged to energise premises must do so within a defined timetable.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and a review of the Move-in procedure and one sample for move-in for a new customer, we noted Horizon Power has controls in place to energise a premise if the premises are attached to a distribution system but are not energised. We noted Horizon Power endeavours to connect a premise within the 20 business day timeframe regardless of whether the premises are within a non-metropolitan/rural area.</p> <p>However, if the meter is installed at the customers' premises, then Horizon Power connects to the meter within the timeframes provided in the Electricity Industry (Obligation to Connect) Regulations, regulation 8.</p> <p>As Horizon Power acts as both the retailer and distributor, where a request has been made by a customer, Horizon Power will connect an address if the premises is attached to the distribution</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	regulation 8		network. Therefore, Horizon Power has complied with this obligation.		
77A.	Electricity Industry (Obligation to Connect) Regulations, regulation 3 Electricity Industry (Obligation to Connect) Regulations, regulation 12(1)	A distributor that proposes to decommission a distribution system or a part of a distribution system must notify: <ul style="list-style-type: none"> the owner of each premises attached to the distribution system or part; and the owner of each premises in relation to which the requirement in sub regulation 5(1)(a) is satisfied in relation to the distribution system or part. 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with Operations Control Centre Manager and Senior Manager Control Centre and review of mail communication, Life support checklist, Notification document, it was noted that if Horizon Power proposes to decommission a distribution system or a part of a distribution system it notifies the (a) the owner of each premises attached to the distribution system or part (b) the owner of each premises in relation to which the requirement in sub regulation 5(1)(a) is satisfied in relation to the distribution system or part. <ul style="list-style-type: none"> On disconnection planning, Horizon Power identifies the list of customers connected in the proposed distribution system Mail the list of the customers in the system with the proposed notification Once the proposed disconnection is completed, feedback is received from the customer about the experience Therefore, Horizon Power has complied with this obligation.		
79	Integrated Regional Licence, condition 4.1.1	A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we noted the following: <ul style="list-style-type: none"> Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. 'MyPower' NSC was initially drafted by the Customer Service and Community and Legal team 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry (Customer Contracts) Regulations, regulation 5		<p>with the assistance of an external legal company.</p> <ul style="list-style-type: none"> All amendments to the NSC are reviewed by the Customer Service and Community and Legal team prior to release to ensure they are expressed in clear, simple, concise language and in a format that is easy to understand. <p>Therefore, Horizon Power has complied with this obligation.</p>		
80	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 6	A non-standard contract must specify when it comes into effect and the period for which it has effect.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity), we noted that Clause 3 describes the starting date of the contract as The Contract begins on the start date, but we may not supply you with electricity in the cooling off period under this Contract unless you request that we do so, and Clause 18 (Ending the Contract) specifies the contract end date.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
81	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts)	A non-standard contract must specify certain information about the retailer.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) we noted that Horizon Power has specified following under clause 23: Trading Name and ABN Number.</p> <p>Additionally, page 2 of NSC Terms and conditions for MyPower for Small Use Customers (Electricity) provides the following information: Register office address and Postal Address, Telephone Number, Email, Website address.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regulations, regulation 7		Therefore, Horizon Power has complied with this obligation.		
82	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 8	A non-standard contract must give an exact description of the goods and services that the retailer will provide under the contract.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) we noted that Clause 1(Supply of electricity) describes the goods and service as follows:</p> <p>Horizon Power will sell electricity to you at the premises in accordance with the Contract, which is comprised by:</p> <p>(a) these terms and conditions;</p> <p>(b) the product rules; and</p> <p>(c) the application that you submitted to us when you agreed to be supplied by us under this Contract.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
83	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 9	A non-standard contract must require the customer to pay for electricity supplied under the contract.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that it requires the customer to pay for electricity supplied under the contract as specified in clause 4.1 'Charges' and clause 6 'Bills'.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
84	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 10	A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that Clause 8 (Electricity Supply Equipment and your equipment) read with clause 8.3 (Prohibited activity) prohibits customer from tamper with, bypass, circumvent or otherwise interfere with the electricity supply equipment, or do anything that will prevent us from accessing the electricity supply equipment, or allow anyone else to do so.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
85	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 11	A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that Clause 12.5 (Disconnection due to your actions) describes the circumstances under which Horizon Power has the right to disconnect supply and clause 12.7(Reconnection of electricity supply) describes the circumstances under which Horizon Power is required to reconnect supply.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
86	Integrated Regional Licence, condition	A non-standard contract must require the retailer to deal with security deposits and the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 19 (Security for Payment of Bills) requires as follows:</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 12	payment of interest in the manner that is specified. Note: Sub regulations 12(2) and 12(3) do not apply to a customer contract of a relevant corporation (Synergy and Horizon Power).	<ul style="list-style-type: none"> Customers to provide security from time to time. Usually, security would be in the form of a cash deposit or a bank guarantee. Security (Cash deposit or Bank Guarantee) will be kept in a separate trust account and identify it separately in accounting records, and use and refund the security in accordance with all applicable laws. <p>We further noted that Horizon Power falls under the definition of a 'relevant corporation' under Section 12(2) of the Electricity Industry (Customer Contracts) regulations, section 12(3) and section 12(4) do not apply to Horizon Power's customer contract.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
86A	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 12	If a customer contract provides for a benefit change, the contract must state that the retailer is required to inform the customer, in the time period prescribed, the benefit change, the options for supply available after the date of the benefit change and describe the way in which the retailer must give that information to the customer.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Senior Manager Customer Service and Community, we were informed that Horizon Power does not provide any kind of benefit changes as mentioned in Electricity Industry (Customer Contracts) Regulations, regulation 12.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
87	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 13	A non-standard contract must describe the prices payable and the circumstances in which the prices are payable, plus the way the retailer publishes and gives notice of variations to its price's information.	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through review of clause 3 (About MyPower Plans) read with clause 3.3 we noted that, contract describes the two main types of MyPower Plans as residential plans and non-residential plans and prices payable are as follows:</p> <p>1) A daily fixed charge; and</p> <p>2) A variable energy usage charge</p> <p>b) Additionally, we noted clause 17.1 of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) describe how Horizon Power will provide customers with information on the standard price and other fees within eight business days of the date of receipt and if requested, the information provided in writing.</p> <p>However, it does not include,</p> <p>(2) A customer contract must describe the way in which the retailer –</p> <p>(a) publishes its prices; and</p> <p>(b) gives notice of variations to its price</p> <p>We further understand that non-standard contracts are not offered from July 2021 onwards due to discontinuation of MyPower product.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
88	Integrated Regional Licence, condition	A non-standard contract must describe the procedures to be followed by the retailer	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that, Horizon Power has covered following clauses for billing in line with		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 14	in relation to the preparation, issue, and review of customer bills.	regulation 14 of Electricity Industry (Customer Contracts) Regulations: Clause 5 - How we will calculate your electricity use (Preparation) Clause 6 - Bills (Issues) Clause 7 - Reviewing Your Bills (Review) Therefore, Horizon Power has complied with this obligation.		
89	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 15	A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 18 describe the matters relating to the termination of a NSC as specified under section 15 of the Electricity Industry (Customer Contracts) regulations. Therefore, Horizon Power has complied with this obligation.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
90	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulations 16(1A), 16(2) and 34	A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent where the amendment is required for the contract to remain consistent with a written law. A non-standard contract must describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published. The non-standard contract must require the retailer to notify the customer of any amendment to the contract.	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that Horizon Power has addressed the obligation 16(1A), 16(2) and 34 of Electricity Industry (Customer Contracts) Regulations, in NSC as follows:</p> <p>Clause 21.8 Amendments to contract states, we can change the terms of the Contract in order for us to comply with any legal obligation imposed upon us with respect to our supply of electricity to consumers, including in the event that there is any change to the Electricity Industry (Customer Contract) Regulations 2005 (WA). If we make any such change, we must notify you of that change as soon as is reasonably practicable following the change.</p> <p>However, we noted that the non-standard contract does not include any information on the process for amending the contract, including requirements for approval and the way the amendment will be published.</p> <p>We further understand that non-standard contracts are not offered from July 2021 onwards due to discontinuation of MyPower product.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
91	Integrated Regional Licence, condition	A non-standard contract must specify the assignment of rights and obligations, including	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 21.3 provides information relating to the assignment of		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 17	assignment without the customer's consent.	<p>rights and obligations, and stipulates that</p> <ul style="list-style-type: none"> Horizon Power can assign or novate the NSC without notice to any person that Horizon Power believe has reasonable commercial and technical capability to perform Horizon Power's obligations under the agreement. Unless Horizon power prior written consent, customer must not transfer, assign or otherwise dispose of any of your rights or obligations under the Contract. <p>Therefore, Horizon Power has complied with this obligation.</p>		
92	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 18	A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 16 describes the procedures that must be followed by Horizon Power in responding to a complaint made by a customer and is stipulated as below</p> <ul style="list-style-type: none"> If you wish to raise a complaint concerning our performance or your electricity supply, we encourage you to contact us to discuss the issue and we will deal with that complaint in accordance with our customer complaints policy. We will ensure that our customer complaints policy complies with the Australian Standard on Complaints Handling [AS/NZS 10002:2014] as amended and in force from time to time. If you are not satisfied with how your complaint is being managed you may have the complaint considered by a senior member of staff or you may raise the complaint with the Energy Ombudsman of Western Australia, whose contact details can be found in our customer complaints policy <p>Therefore, Horizon Power has complied with this obligation.</p>		
93	Integrated	A non-standard contract	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 19	must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially. The customer contract must specify that the retailer has a privacy policy and the customer can obtain a copy of the policy without charge.	Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 15 (Confidentiality of your information) specifies instances where Horizon Power will uphold the confidentiality of customer's information and it talks about the NSC is in consistent with privacy policy and the customer can obtain a copy of the policy from the public domain. Therefore, Horizon Power has complied with this obligation.		
94	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 20	A non-standard contract must specify the governing legislation, the effect of an invalid or unenforceable provision, the way in which notice may be given and the use of electronic communication by the retailer.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that Horizon Power has addressed the obligation 20 of Electricity Industry (Customer Contracts) Regulations, in NSC as follows: <ul style="list-style-type: none"> • Clause 21.7 (Governing Law) - The Contract is governed by the laws of the State of Western Australia • Clause 21.9- Effect of Invalid Terms/provisions in NSC • Clause 21.1 (Notices) - Issue of any notice or other communication given under the Contract • Clause 21.2 - Electronic communication Therefore, Horizon Power has complied with this obligation.		
95	Integrated Regional Licence,	A non-standard contract must not include a provision that excludes,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 21	restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.	<p>(Electricity) and the MyPower Product Rules, noted that there are no provisions in the NSC that exclude, restrict, or modify the Code of Conduct for the Supply of Electricity to Small Use Customers unless expressly authorised by the Code of Conduct. Additionally, clause 14(a)(ii) of Horizon Power's NSC Terms and conditions for MyPower states that:</p> <p>Nothing in this Contract is to be taken to exclude, restrict or modify any condition, warranty or guarantee that we are prohibited by law from excluding, restricting or modifying.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
96	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 32	A non-standard contract must include details about the cooling off period specified in the regulation.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that Horizon Power has addressed the obligation 32 of Electricity Industry (Customer Contracts) Regulations, in NSC as follows:</p> <ul style="list-style-type: none"> • Clause 23.1 of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) defines cooling-off period as a period of ten consecutive days following the date on which the customer and Horizon Power enter into the NSC. • Additionally, we noted the following clauses of the MyPower Product Rules include information regarding the cooling-off period for NSC as specified under section 32 of the Electricity Industry (Customer Contracts) regulation: <ul style="list-style-type: none"> - Clause 2.1 - Customers may end this Contract within ten days of the date you submitted your application (cooling-off period). - Clause 2.2 - Horizon Power will not supply will not supply customer with electricity during the cooling-off period under this Contract unless you indicate in the application that customer want to be supplied with electricity during the cooling-off period under this Contract. - Clause 2.3 - Customer is liable to pay in accordance with this Contract in respect of such supply of electricity under this Contract during the cooling-off period in accordance with 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>clause 2.2.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
97	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry (Customer Contracts) Regulations, regulation 33(2)</p>	<p>A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 18.2 (When you can end the Contract) allows customer to end the Contract at any time by advising Horizon Power at least 5 days before the day you want the Contract to end.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
98	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry (Customer Contracts) Regulations, regulations</p>	<p>A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.</p>	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager confirmed that Horizon Power NSC does not express any definite period and Horizon Power does not offer fixed term NSC, thus the requirement as specified under section 33(3) and 33(4) of the Electricity Industry (Customer Contracts) regulation is not applicable and could not be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	33(3) and (4)				
98A	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 34A	A non-standard fixed term contract must detail the contract expiry date, customer options available for supply following expiry, the terms and conditions that apply after expiry and the way the retailer will provide the notification in the manner specified.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, it was confirmed that Horizon Power NSC does not express any definite period and Horizon Power does not offer fixed term NSC, thus the requirement as specified under section 33(3) and 33(4) of the Electricity Industry (Customer Contracts) regulation is not applicable and could not be rated for compliance.		
98B	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 34B	A non-standard contract for residential customer must not state that the residential customer is required to pay a security deposit.	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity), it was noted that clause 19 (Security for Payment of Bills) requires the customers to provide a security deposit from time to time, usually in the form of a cash deposit or a bank guarantee. The security (Cash deposit or Bank Guarantee) will be kept in a separate trust account and identified separately in accounting records, with use and refund the security in accordance with all applicable laws.</p> <p>Which is not in-line with the Regulation 34B (Security deposits not payable by residential customers) of Electricity Industry (Customer Contracts) Regulations, regulation 2022.</p> <p>We further understand that non-standard contracts are not offered from July 2021 onwards due to discontinuation of MyPower product.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		
98C	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Customer Contracts) Regulations, regulation 34C	A non-standard contract, entered into by a non-residential customer, is required to state whether the customer must pay a security deposit, how the amount of the security deposit is calculated, the maximum amount the retailer may request, when the retailer may use the security deposit to offset the amounts owed by the customer and when the retailer must repay the security deposit.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 19 (Security for Payment of Bills) requires the customer to provide a security deposit from time to time, usually in the form of cash deposit or a bank guarantee. Security deposits will be kept in a separate trust account and identified separately in accounting records, with use and refund of the security deposit in accordance with applicable laws.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
99	Integrated Regional Licence, condition 6.2.1 Electricity Industry (Customer	The distributor must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee (distributor).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Based on enquiries held with the Asset Services and Operations team, it was concluded that no other electricity providers had access to Horizon Power's distribution system during the audit period, and as a result, they are required to determine the default supplier for each connection point. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Contracts) Regulations, regulation 36				
100	Integrated Regional Licence, condition 6.8.1 Electricity Industry (Customer Contracts) Regulations, regulation 38	If a licensee becomes aware of a customer taking a supply of electricity that is deemed to be supplied under the licensee's standard form contract, the licensee must notify the customer within 5 days after becoming aware of it and provide specified information.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, it was noted that the property is de-energised when the previous occupier closes their account. Customers will only be supplied electricity if they have entered into either a standard or non-standard form agreement with Horizon Power and therefore, Horizon Power will not place customers under a deemed contract.</p> <p>Based on further discussions held with the Retail Operations Manager, it was concluded that Horizon Power did not place customers under a deemed contract during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
101	Integrated Regional Licence, condition 5.3.1 Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months (or any longer period that the ERA allows).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Risk & Audit Specialist, we noted that the Risk & Audit Team uses CURA, Horizon Power's risk management system, which flags key upcoming activities and accompanying due date. When the ERA publishes notices and due dates for upcoming performance reports, this is updated in CURA to ensure the tender process for an independent auditor can be begin within an appropriate timeframe. The previous EIRL2 Performance Audit was conducted by KPMG in 2020 for the audit period 1 April 2017 to 31 March 2020. The Authority has approved the appointment of EY on 14 March 2023, to conduct the performance audit for the audit period 1 April 2020 to 31 March 2023.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
102	Integrated Regional Licence, condition 5.1.1 Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Asset Services Senior Manager and Asset Services Delivery Manager and review of documents, such as the Asset Management Strategy, Asset Management Policy and Asset Management Planning, it was observed that Horizon Power has established appropriate asset management system. This is reviewed and updated every 5 years.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
103	Integrated Regional Licence, condition 4.1.1 Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Asset Services Senior Manager and Asset Services Delivery Manager, and review of the Asset Management System documents (e.g. Asset Management Strategy, Asset Management Policy, Asset Management Planning etc.), it was observed that there were no substantial changes to the Asset Management System during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
104	Integrated Regional Licence, condition 5.1.4 Electricity Industry Act,	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Asset Services Senior Manager and Asset Services Delivery Manager and review of documents, 'Notice Publication of 2020 asset management system review report - Horizon-Power', 'Asset Management System review report - Horizon-Power' it was observed that HP has conducted Asset Management System review/ assurance conducted by KPMG for the period '1 July 2017 to 30 June 2020' and complies with the regulatory requirement from ERA. Review</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 14(1)(c)	period as determined by the ERA.	<p>recommendations from ERA stated, As there were no deficiencies found in the review, the auditor did not make any recommendations. Horizon Power was not required to provide a post-review implementation plan.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
105	Integrated Regional Licence, condition 4.2.1 Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i> .	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>The Economic Regulation Authority (Licensing Funding) Regulations clauses 6, 7 and 8 details the requirement for the payment of quarterly 'Standing Charges' for each 3 month quarter, ending 30 September, 31 December, 31 March, 30 June. The Senior Legal Counsel confirmed that the annual electricity licence charge is paid within one month of the 30 March anniversary date. All invoices issued by the ERA are received by the Governance Coordinator and processed through Horizon Power's accounts payable process.</p> <p>Desktop review of Horizon Power's records of licence fee payments and respective invoices noted that, during the audit period, the annual licence fees were paid within one month of the 30 March anniversary date and the quarterly standing charges were paid within 30 days of the notice being issued in accordance with the Economic Regulation Authority (Licensing Funding) Regulation clauses 6, 7 and 8.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
106	Integrated Regional Licence, condition 4.1.1 Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident,	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Asset Services Senior Manager, Asset Services Delivery Manager, Senior Manager System & Network Planning, Principal Planning engineer and review of Horizon Power Crisis & Emergency Management Plan 2022, Network_Planning_Guidelines_-_HPC-2HH-07-0001-2019, Ningaloo Solar Eclipse - Operational Readiness Plan - 30 March 2023, it was observed that Horizon Power has implemented the following controls:</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		emergency, potential danger or other unavoidable cause.	<ul style="list-style-type: none"> Horizon Power has established a Crisis and Emergency Management Plan providing guidance on responding to and recovering from an incident, emergency or crisis. Appendix 10 of the document outlines the specific actions to be undertaken during an electricity supply disruption. A comprehensive list of internal and external stakeholders, including key contact details of specialists are notified based on the severity of the event. Chapter-3 of Network planning guidelines details out the process from the design stages to reduce the interruptions by building parallel circuits, contingency plans in designing a power system (load forecasting, Capacity assessment, risk, and reliability assessments) for managing contingency situations. On review of one sample on interruption, in anticipation of the Ningaloo Solar eclipse, Horizon Power has devised a comprehensive demand side management strategy coupled with an operations readiness plan. This meticulously crafted approach aims to effectively manage the foreseen changes in energy load, ensuring minimal interruptions and reducing their duration. The ops readiness plan complements the demand side management strategy by ensuring that Horizon Power's operations and infrastructure are primed to handle the anticipated challenges <p>Therefore, Horizon Power has complied with this obligation.</p>		
107	Integrated Regional Licence, condition 4.1.1 Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interview with the Sustainability Manager and examination of documents, we noted that Horizon Power had interests in land or an easement over land during the audit period. There are a number of potential costs involved in obtaining an easement, including: Surveyance costs, preparation of a Deed of Easement, SME Advice, Legal Advice, Lodgement Costs, and Native Title Compensation.</p> <p>Desktop review of the easement or purchasing of land and sample testing noted that payments made in relation to the easements or purchasing of land are borne by the project team or through budget expenditure of the regions within Horizon Power.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
108	Integrated Regional Licence, condition 6.4.1 Electricity Industry Act, section 54(1)	A retail or integrated regional licensee must not supply electricity to a small use customer otherwise than under a standard form contract or a non-standard form contract that complies with the Act.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted all small-use customers are either on a Standard form of Contract (SFC) or Non-standard Contract (NSC). Horizon Power outlines their obligation to not supply electricity to a customer otherwise than under a SFC and additional terms within their Connection Application Form.</p> <p>Through review of Horizon Powers Connection Application Form, we noted that Horizon Power will not supply electricity to a customer otherwise than under a SFC and the additional terms. The condition states that, By submitting this application form, you acknowledge that you are entering into a binding agreement with Horizon Power for the Service and the performance of the Works on the terms set out in your contract for supply of electricity by Horizon Power to you (Standard Contract) and the Additional Terms.</p> <p>Further, on review of the new connection application form, it was noted that it does not clearly specify whether the customer is under obligation to enter into a binding agreement Horizon Power for the Service and the performance of the Works on the terms set out in NSC.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
109	Integrated Regional Licence, condition 6.6.1 Electricity Industry Act, section 54(2)	A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Senior Manager Customer Service and Community and review of one approval from ERA on standard form of contract, we noted that changes to standard form of contract is requested to the ERA on a timely basis.</p> <p>Further we were also informed that standard form of contract is not put in the use until the ERA approval is received.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
111	Integrated Regional Licence, 6.1.1 Electricity Industry Act, section 101	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and a review of the Energy and Water Ombudsman's website we noted Horizon Power is a member of the Energy and Water Ombudsman Scheme.</p> <p>Horizon Power has been granted an Electricity Integrated Regional Licence. The Licence precludes Horizon Power from supplying electricity to a small use customer unless it is a member of the approved electricity ombudsman scheme to which it is bound to comply with requirements in relation to customer complaints handling.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
114	Electricity Industry Act, section 11 Integrated Regional Licence, condition 6.3.1	A licensee must ensure that an electricity marketing agent of the licensee complies with the Code of Conduct for the Supply of Electricity to Small Use Customers 2022.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power did not engage in any marketing activity during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
116	Electricity Industry Act, section 11 Integrated Regional Licence, condition 6.4.2	A licensee must, if directed by the ERA, review the standard form contract and submit to the ERA the results of that review within the time specified.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of an email communication with the ERA and review undertaken for the standard form of contract. It was noted that Horizon Power followed the directions from the Authority to review or amend the SFC during the audit period.</p> <p>Further through interviews with the Senior Manager Customer Service and Community, we were informed that if Horizon Power were directed to comply, with any direction by the ERA to amend the SFC, they would update the CURA system (Horizon Power risk management software) to reflect the direction including any period specified, with automated reminders assigned to the accountable personnel to address the SFC as required.</p> <p>If the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified.</p> <p>Further we were also informed that standard form of contract is not put in the use until the ERA approval is received.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
117	Electricity Industry Act, section 11 Integrated Regional Licence, condition 6.4.3	A licensee must comply with any direction given by the ERA in relation to the scope, process and methodology of the standard form contract review.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of an email communication with the ERA and review undertaken for the standard form of contract. It was noted that Horizon Power followed the directions from the Authority to review or amend the SFC during the audit period.</p> <p>Further through interviews with the Senior Manager Customer Service and Community, we were informed that if Horizon Power were directed to comply, with any direction by the ERA to amend the SFC, they would update the CURA system (Horizon Power risk management software) to reflect the direction including any period specified, with automated reminders assigned to the accountable personnel to address the SFC as required.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>If the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified. Further we were also informed that standard form of contract is not put in the use until the ERA approval is received.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
118	Electricity Industry Act, section 11 Integrated Regional Licence, condition 6.5.1	A licensee can only amend the standard form contract with the ERA's approval.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of an email communication with the ERA and review undertaken for the standard form of contract. It was noted that Horizon Power followed the directions from the Authority to review or amend the SFC during the audit period.</p> <p>Further through interviews with the Senior Manager Customer Service and Community, we were informed that if Horizon Power were directed to comply, with any direction by the ERA to amend the SFC, they would update the CURA system (Horizon Power risk management software) to reflect the direction including any period specified, with automated reminders assigned to the accountable personnel to address the SFC as required.</p> <p>If the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified.</p> <p>Further we were also informed that standard form of contract are not put in the use until the ERA approval is received.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
119	Electricity Industry Act, section 11 Integrated	A licensee and any related body corporate must maintain accounting records that comply with the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Financial Accounting Manager, we noted that Horizon Power complies with the Australian Accounting Standards. Review of the past 3 Financial Statements spanning the audit period, financial years ending June 2020, 2021, 2022, showed that the reports were</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.3.1	Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	prepared in accordance with the Australian Accounting Standards. Therefore, Horizon Power has complied with this obligation.		
120	Electricity Industry Act, section 11 Integrated Regional Licence, condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we noted that Horizon Power update the CURA system (Horizon Power risk management software) to reflect the new performance standards and allocate accountable personnel to address the performance standard if any directed by ERA. It was confirmed that, Horizon Power was not directed by ERA to comply with any individual performance standards during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
121	Electricity Industry Act, section 11 Integrated Regional Licence, condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			On 14 March 2023, the ERA approved EY as Horizon Power's independent auditor for the 2023 EIRL2 Performance Audit. The audit plan was drafted in accordance with the ERA's standard audit guidelines and subsequently approved by the ERA on the 10 May 2020. In the 2023 Performance Audit Report, EY confirmed the performance audit was conducted as a reasonable assurance engagement and was undertaken in accordance with the requirements under the Audit and Review Guidelines: Electricity and Gas Licences March 2019. Therefore, Horizon Power has complied with this obligation.		
122	Electricity	A licensee must comply,	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 11 Integrated Regional Licence, condition 5.1.5	and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	<p>Through review of 2020 Asset Management Report, we noted that the ERA approved KPMG as Horizon Power's independent auditor for the 2020 EIRL2 Asset Management System Review. The audit plan was drafted in accordance with the ERA's standard audit guidelines and subsequently approved by the ERA on the 1 September 2020.</p> <p>In the 2020 Performance Audit Report, KPMG confirmed the performance audit was conducted as a reasonable assurance engagement and was undertaken in accordance with the requirements under the Audit and Review Guidelines: Electricity and Gas Licences March 2019.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
123	Electricity Industry Act, section 11 Integrated Regional Licence, condition 4.4.1	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Senior Legal Counsel and Paralegal, it was noted that during the audit period Horizon Power was not under external administration and no significant changes that affected Horizon Power's ability to meet its obligations occurred. If Horizon Power is under external administration, the General Manager Corporate Services and Company Secretary will notify the Economic Regulatory Authority.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
124	Electricity Industry Act, section 11 Integrated Regional Licence,	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry	Priority: 2	Control Adequacy: C	Compliance Rating: 2
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power are required to annually prepare and submit a Performance Report and Compliance Report to the ERA.</p> <p>Compliance Report: The Compliance Report is updated throughout the reporting year as breaches are identified. Horizon Power utilise their CURA system (Horizon Power risk management software) to automate reminders to the Retail Operations Manager to submit the Annual Compliance Report to</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings
	condition 4.5.1	Act.	<p>the ERA. The report contains the following information as specified by the ERA in the Electricity Compliance Reporting Manual:</p> <ul style="list-style-type: none"> • Confirmation that Horizon Power has complied with all applicable Type 1 and 2 licence obligations during the period, other than those specifically referred to in Schedule A of the report; and • Identified any Type 1 or Type 2 licence obligations that have been breached during the period and provided details of: <ul style="list-style-type: none"> • The licence obligation that has been breached; • The nature and extent of the breach; • The impact of the breach including the number of customers and other licensees affected; • The reasons for the breach; • The actions that the licensee has taken to rectify the breach; • The actions taken by the licensee to prevent recurrence of the breach; and o The date the licensee has, or expects to, comply again fully with the licence obligation that has been breached. <p>Through sample testing was conducted over three Compliance Reports from the period and noted they contained the information as specified by the ERA, complying with the obligation requirements.</p> <p>Performance Report: Each year, the ERA provides Horizon Power with the information required to be submitted via the following templates:</p> <ul style="list-style-type: none"> • Electricity Compliance Manual Datasheet (the Retail Datasheet); • Electricity Licence Reporting Datasheets - Distribution (Distribution Datasheet); and • Electricity Licence Reporting Datasheets - Network Quality and Reliability Code (Network Quality and Reliability Datasheet). <p>The Retail Operations Manager is responsible for compiling the data in these Datasheets and will submit these to the ERA prior to 30 September each year. The Distribution and Network Quality and Reliability Datasheets are compiled by other areas of the business, utilising data stored in Velocity</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings
			<p>and mData21 to provide figures against each indicator. We obtained the Distribution Datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>The Retail Datasheet is prepared by the Retail Operations Manager with the help of Velocity and Power BI. Data is extracted from Velocity and reviewed against each indicator. Once compiled, the Retail Datasheet is submitted to the ERA prior to 30 September. We obtained the Retail datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>We understand that following information is provided in the Performance Report:</p> <ul style="list-style-type: none"> • Customer numbers • Billing and payment • Disconnections for non-payment • Reconnections • Complaints • Compensation payments • Call Centre Performance • Energy Bill Debt • Hardship Customers <p>Note: We understand that all these information can only be extracted at a real-time position, and we could not extract the same data to complete sample validation. The supporting details for the performance report was not saved by the Horizon Power CSC team at the time of the Retail Datasheet preparation.</p> <p>Sample testing was attempted over the performance indicators, however due to the source data not being saved at the time of compiling the report, this could not be reperformed. Also, through review of Velocity Reports and Power BI reports as on given point of time, we noted that statistics available in both systems could not be reconciled.</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Based on interviews and review of documents, it was concluded that Horizon Power has inadequate controls with significant improvement needed, however due to the source data not being saved at the time of compiling the report, compliance testing could not be performed.		
125	Electricity Industry Act, section 11 Integrated Regional Licence, condition 3.8.1 and 3.8.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of Horizon Power website, we noted that Horizon Power controls in place to publish all information as directed by the ERA, within the prescribed timeframes.</p> <p>This is tracked through the CURA system (Horizon Power risk management software), with task owners receiving notifications via email of upcoming due dates. We noted Horizon Power published the 2019/20, 2020/21 and 2021/22 Annual Performance Reports for its Integrated Regional Licence.</p> <p>The Retail Operations Manager confirmed that during the audit period, there were no other formal request from the ERA for the publication of any additional information.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
126	Electricity Industry Act, section 11 Integrated Regional Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not provide any responses to the ERA that are not in writing; and all previous communications and submissions during the audit period were evidenced in written form.</p> <p>Further, on review of changes requested by the ERA on standard form of contract, we noted all the communications were performed over an email and documents are submitted in written form.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
127	Electricity	A distributor must create	Priority: 2	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 11 Integrated Regional Licence, condition 6.9.1	and maintain a Priority Restoration Register.	<p>Through interviews with the Asset Services Senior Manager, Senior Manager System Operations and Operations Control Centre Manager and review of Horizon Power's Crisis and Emergency management, Pilbara_Network_CONTINGENCY_PLAN_V3, Operations Master Priority Restoration Feeders, ESPERANCE - ESPERANCE DISTRICT CONTINGENCY PLAN, it was observed that Horizon Power has implemented following controls.</p> <ul style="list-style-type: none"> • Crisis and Emergency Management Plan - providing guidance and protocol on responding to, and recovering from, an incident, emergency, or crisis. The Plan applies to all Horizon Power network and office locations. • Pilbara Contingency Plan - Provides the detailed information to minimise the likelihood and impact of a disruption-related event, through the provision of information to guide or assist in the timely restoration of power supplies and providing details of priority feeders for restoration during the times of emergency • Master Priority Restoration Feeders provides the control centre team a long list of feeders lists with priorities of restoration. <p>Therefore, Horizon Power has complied with this obligation.</p>		
128	Electricity Industry Act, section 11 Integrated Regional Licence, condition 6.9.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Asset Services Senior Manager, Senior Manager System Operations and Operations Control Centre Manager it was noted that the Minister has not detailed any specific criteria regarding the Priority Restoration Register during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
129A	Electricity Industry Act,	A retailer must ensure that its electricity	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that there have not been</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 82 Code of Conduct, clause 8 Integrated Regional Licence, condition 6.3.1	marketing agents comply with Part 2.	any marketing activity from April 2020 to March 2023. Also, this compliance obligation has recently been applicable from Feb 2023 in line with Code of Conduct 2022. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
130	Electricity Industry Act, section 82 Code of Conduct, clause 9(1) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must ensure that standard form contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 9(1).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power has not executed any unsolicited agreements and customers may enter a SFC by either contacting a Horizon Power CSR, completing a web application form or Connection Application Form. We noted Horizon Power have the following controls in place to ensure SFCs are provided in the conditions specified under the clause 9 (entering standard form contract) of Code of Conduct: <ul style="list-style-type: none"> • Velocity shall automatically record the date on which the standard form contract was entered into; and • On review of call scripts, we noted that, Customers are advised that a copy of the SFC is publicly available on Horizon Power's website at no cost. Therefore, Horizon Power has complied with this obligation.		
131	Electricity Industry Act, section 82	Subject to subclause 9(3), the retailer or electricity marketing agent must give to the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through review of one sample welcome letter provided at the time of move-in to customers, we noted that the following three key documents and state that all documents can be obtained on the		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 9(2) Integrated Regional Licence, condition 6.3.1	customer the specified information in subclause 9(2) no later than on, or with, the customer's first bill.	<p>Horizon Power website:</p> <ul style="list-style-type: none"> • Customer charter • Code of Conduct for the Supply of Electricity to Small use Customers; and • SFC. <p>On further review of customer charter, we noted that the following information was included:</p> <ul style="list-style-type: none"> • The scope of the Code; • Horizon Power's obligation to comply with the Code; • How Horizon Power will assist a customer if the customer is experiencing financial hardship or payment difficulties; • Information on billing concessions that may be available to residential customers; • Horizon Power's 24-hour faults telephone number; • Interpreter and TTY (Teletypewriter) services that are available to residential customers; • Details on how a customer can make a complaint; and • General information of electrical safety. <p>Therefore, Horizon Power has complied with this obligation.</p>		
132	Electricity Industry Act, section 82 Code of Conduct, clause 10(1) Integrated Regional Licence, condition	A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified,	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through interviews with the Retail Operations Manager, we noted all NSC entered are not unsolicited consumer agreements and customers may enter NSC by either contacting a Horizon Power MyPower representative or completing a web application form.</p> <p>We noted Horizon Power have the following controls in place to ensure NSC are provided in the conditions specified under the Code of Conduct:</p> <ul style="list-style-type: none"> • Obtain verifiable consent: We were informed that all verifiable consents are obtained over call. Also, through review of call scripts we noted that verifiable consent is obtained before entering into a non-standard contract. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	6.3.1	in clause 10(1).	<ul style="list-style-type: none"> Non-standard contract is available at no charge to the customer. It was advised that the NSC is available at no charge on Horizon Power's website at the time of sign-up. <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20 as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering into a non-standard contract.</p> <p>We further understand that non-standard contracts are not offered from July 2021 onwards due to discontinuation of MyPower product.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
133	Electricity Industry Act, section 82 Code of Conduct, clause 10(2) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must ensure that the information specified in subclause 10(2) is provided to the customer before entering into a non-standard contract.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of a call script for move-in, we noted Horizon Power have controls in place to confirm that following information is provided to customers prior to agreeing in entering into a NSC:</p> <ul style="list-style-type: none"> (i) a statement that the customer is able to choose the standard form contract offered by the retailer; and (ii) details of the difference between the non-standard contract and the standard form contract; <p>The Product Specification Document (NSC call script) states that the customer may cancel the non-standard agreement at any time during the cooling-off period and that the customer may obtain further information including the concessions and how to avail concessions. Also, we noted that Customer Charter, Code of Conduct and non-standard that the customer may obtain through the Horizon Power website.</p> <p>Based on interviews and review of documents, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			period.		
133A	Electricity Industry Act, section 82 Code of Conduct, clause 10(3) Integrated Regional Licence, condition 6.3.1	If subclause (4) applies, when a customer enters into a non-standard contract with a retailer, the retailer or an electricity marketing agent must give the information specified in clause 10(3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted once a CSR has logged a new connection within Velocity upon entering a customer into a SFC, the connection date is automatically recorded in Velocity and system automatically triggers a welcome letter to the customer and will therefore be provided prior to the customer's first bill.</p> <p>A welcome letter highlights the following three key documents and state that all documents can be obtained on the Horizon Power website:</p> <ul style="list-style-type: none"> • Customer Charter • Code of Conduct for the Supply of Electricity to Small use Customers; and • Non-standard contract. <p>A copy of the Customer Charter was obtained and examined, and we noted the following information was included:</p> <ul style="list-style-type: none"> • The scope of the Code; • Horizon Power's obligation to comply with the Code; • How Horizon Power will assist a customer if the customer is experiencing financial hardship or payment difficulties; • Information on billing concessions that may be available to residential customers; • Horizon Power's 24-hour faults telephone number; • Interpreter and TTY services that are available to residential customers; • Details on how a customer can make a complaint; and • General information of electrical safety. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
134	Electricity Industry Act, section 82 Code of Conduct, clause 2.3(4) Integrated Regional Licence, condition 6.3.1	The Electricity Generation and Retail Corporation or Regional Power Corporation, or an electricity marketing agent acting on behalf of Electricity Retail Corporation or Regional Power Corporation, must ensure that the information specified in subclause 2.3(4) is provided to the customer before arranging a non-standard contract.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of a call script for move-in, we noted Horizon Power have controls in place to confirm that following information is provided to customers prior to agreeing in entering into a NSC:</p> <ul style="list-style-type: none"> a statement that the customer is able to choose the standard form contract offered by the retailer; and details of the difference between the non-standard contract and the standard form contract; <p>Also, we noted that Customer Charter, Code of Conduct and non-standard that the customer may obtain through the Horizon Power website.</p> <p>Based on interviews and review of documents, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>		
135	Electricity Industry Act, section 82 Code of Conduct, clause 10(5) Integrated Regional Licence, condition 6.3.1	Subject to subclause 10(4), a retailer or electricity marketing agent must obtain the customer's verifiable confirmation that the specified information in subclause 10(2), as applicable, has been provided.	Priority: 3	Control Adequacy: B	Compliance Rating: 2
			<p>Through interviews with the Retail Operations Manager and review of a call script for move-in, we noted Horizon Power have controls in place to confirm that following information is provided to customers prior to agreeing in entering into a NSC:</p> <ul style="list-style-type: none"> a statement that the customer is able to choose the standard form contract offered by the retailer; and details of the difference between the non-standard contract and the standard form contract. <p>The Product Specification Document (NSC call script) states that the customer may cancel the non-standard agreement at any time during the cooling-off period and that the customer may obtain further information including the concessions and how to avail concessions.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>Also, we noted that Customer Charter, Code of Conduct and non-standard that the customer may obtain through the Horizon Power website.</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Report of 2019-20 as verifiable consent was not obtained for 1013 customers registered during 2019-20 before entering a non-standard contract. Also, we noted that non-standard contracts are not offered from July 2021 onwards.</p> <p>We further understand that non-standard contracts are not offered from July 2021 onwards due to discontinuation of MyPower product.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
136	Electricity Industry Act, section 82 Code of Conduct, clause 11(1) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must ensure that the inclusion of concessions is made clear to residential customers of the retailer and that any prices that exclude concessions are disclosed.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of Horizon Power website, we noted concession details are provided to customers by the following methods to comply with clause 11(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> As part of the move-in process, customers who establish an account are sent an acknowledgement email and a Welcome Letter in the mail. In both the acknowledgement email and welcome letter, customers are referred to the Customer Charter under billing concessions, which includes general concession information and informs customers on where further information on concessions can be obtained and how these are applied; and The Horizon power website and Financial Hardship policy provides customers with information on concession and rebates. On review of Horizon Power website, we have noted that customers are eligible for concessions and rebates. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
137	Electricity Industry Act, section 82 Code of Conduct, clause 11(2) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must provide contact details, including their telephone number, to a customer and ensure that the customer is able to contact the retailer or electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has a dedicated team for the purposes of enquiries, verifications and complaints. The operating hours of the customer service call centre are 8 am to 5 pm (AWST) during weekdays for both residential and business customers. The working hours and contact details have been documented on the following:</p> <ul style="list-style-type: none"> • Customer Charter; • Horizon Power website; • Financial Hardship Policy; • Customer bills; • Reminder notices; and • Disconnection warnings <p>Therefore, Horizon Power has complied with this obligation.</p>		
138	Electricity Industry Act, section 82 Code of Conduct, clause 12(1) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 12(1).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that there have not been any marketing activities conducted for the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
139	Electricity	A retailer or electricity	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 82 Code of Conduct, clause 12(2) Integrated Regional Licence, condition 6.3.1	marketing agent who meets with a customer face to face must: <ul style="list-style-type: none"> display a clearly visible and legible identity card showing the information specified in subclause 12(2)(a); and provide the written information specified in subclause 12(2)(b) as soon as practicable following a request by the customer. 	Through interviews with the Retail Operations Manager, we were informed that Horizon Power did not meet customers face to face for the purposes of marketing from April 2020 to March 2023. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
140	Electricity Industry Act, section 82 Code of Conduct, clause 13	A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we were informed that there have not been any marketing activity from April 2020 to March 2023. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		at the premises.			
141	Electricity Industry Act, section 82 Code of Conduct, clause 2.9 Integrated Regional Licence, condition 6.3.1	An electricity marketing agent must keep a record of complaints from customers or persons who are contacted by, or on behalf of, the electricity marketing agent for the purposes of marketing; and provide the electricity ombudsman with all of the information that it has relating to a complaint, within 28 days of receiving a request for that information.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Based on interviews held with the Retail Operations Manager we were informed that Horizon Power did not engage with an electricity marketing agent during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
142	Electricity Industry Act, section 82 Code of Conduct, clause 2.10 Integrated Regional Licence, condition 6.3.1	An electricity marketing agent must keep a record, or other information, required under the Code for at least 2 years after the last time that a customer or person was contacted by, or on behalf of, the electricity marketing agent, or after receipt of the last contact from, or on behalf of, the electricity marketing agent, whichever is later.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on interviews held with the Retail Operations Manager we were informed that Horizon Power did not engage with an electricity marketing agent during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
145	Electricity Industry Act, section 82 Code of Conduct, clause 19(1)	A retailer must issue a bill at least once every 100 days, except for the circumstances specified in subclause 19(2).	Priority: 1	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power's Velocity system is configured to confirm that customers are not billed more than once a month, and at least once every three months. The use of AMI meters ensures that reads are made multiple times throughout the day and uploaded to Velocity from mData21.</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019–20, 2020-21 and 2021-22 Annual Compliance Report as customers unbilled for more than three (3) months as follows:</p> <p>2019-20: Two instances: In both of the properties, fault was noted, and meters were removed due to safety reasons. The accounts were subsequently closed and billed based on estimated reading.</p> <p>2020-21: Three instances: In two cases, accounts were unbilled because meter was removed and in one case, meter related to the disconnected premise but not closed in Velocity. The accounts were subsequently closed and billed based on estimated reading.</p> <p>2021-22: Four instances: In two cases, accounts were unbilled due to meter reconfigurations leading to delay in meter reading. In one case account was unbilled due to incorrect entering of meter reading schedule and final case of unbilled account was due to entering incorrect read register information for a solar installation.</p> <p>The following measures were taken to rectify the breach:</p> <ul style="list-style-type: none"> • Meter read schedules were recalculated/rectified and correct invoices issues • Meter read schedule was corrected and bill reissued • Meter reprogrammed and reconfigured to update meter read register <p>Through sample testing, of customer bill transaction history, it was evident that horizon power bills the customer either once in a month or two months. Also, PowerBI report is generated on a weekly basis to minimise the cases of unbilled instances.</p> <p>Based on interviews and review of documents, while Horizon Power has self-reported this obligation as non-compliant, it was concluded that Horizon Power has used their best endeavours to issue bills timely and to monitor the delayed instances. Hence, Horizon Power is compliant to this obligation.</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
146	Electricity Industry Act, section 82 Code of Conduct, clause 4.2(1)	For the purposes of subclause 4.1(a)(ii), a retailer has given a customer notice if, prior to placing a customer on a shortened billing cycle, the retailer advises the customer of the information specified in subclause 4.2(1).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
146A	Electricity Industry Act, section 82 Code of Conduct, clause 20(1)	A retailer must not place a customer on a shortened billing cycle unless subclause 20(2) applies.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
147	Electricity Industry Act, section 82 Code of Conduct,	If a residential customer informs a retailer that the customer is experiencing payment difficulties or financial hardship and the	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 4.2(2)	customer is assessed as experiencing payment difficulties or financial hardship, the retailer must not place that customer on a shortened billing cycle without that customer's verifiable consent.	that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
148	Electricity Industry Act, section 82 Code of Conduct, clause 20(3)	A retailer must give a customer notice with the information specified in 20(3), within 10 business days after placing the customer on a shortened billing cycle under subclause 20(2).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
149	Electricity Industry Act, section 82 Code of Conduct, clause 20(4)	A retailer must ensure that a shortened billing cycle under subclause 20(2) must be at least 10 business days.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>cycle as described by the code.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
150	Electricity Industry Act, section 82 Code of Conduct, clause 20(5)	On request, a retailer must return a customer who is subject to a shortened billing cycle, under subclause 20(2), to the billing cycle that previously applied if the customer has paid 3 consecutive bills by the due date.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
151	Electricity Industry Act, section 82 Code of Conduct, clause 20(6)	A retailer must inform a customer, who is subject to a shortened billing cycle, under subclause 20(2), at least every 3 months about the conditions upon which the customer can, upon request, be returned to the previous billing cycle under subclause 20(6).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycle. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service. The Retail Operations Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
154	Electricity Industry Act, section 82 Code of Conduct, clause 4.4	A retailer must issue a bill to a customer at the customer's supply address, unless the customer has nominated another address or an electronic address.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted the following controls are in place to ensure compliance of clause 4.4 of the Code of Conduct:</p> <ul style="list-style-type: none"> • Horizon Power has billing processes and systems to capture both a customer's supply address and an alternate postal address. • All bills are automatically issued electronically and sent to a customer's supply address unless an alternative postal address has been nominated by the customer. Both a customer's supply address and alternate postal address are captured within Velocity. • On review of Horizon Power's Connection Application Form, we noted that Horizon Power's application process captures both the supply address and the postal address, allowing customers to nominate an alternate postal address. • On review of sample customer, we noted that bills we noted that bot customer's supply address or alternative postal address has captured. <p>Therefore, Horizon Power has complied with this obligation.</p>		
155	Electricity Industry Act, section 82 Code of Conduct, clause 4.5(1)	A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer's bill, unless the customer agrees otherwise.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of one sample customer bill, we have noted the following contents available as required by Clause 21</p> <p>(a) Range of dates of the metering supply period or the date of the current meter reading or estimate;</p> <p>(b) if the customer has an accumulation meter installed (whether or not the customer has entered into an export purchase agreement with a retailer)– Current meter reading or estimate</p> <p>(c) if the customer has not entered into an export purchase agreement with a retailer–</p> <p>(i) the customer's consumption, or estimated consumption; and</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings
			<p>(ii) if the customer is on a time of use tariff, the customer's consumption or estimated consumption for the total of each time band in the time of use tariff;</p> <p>(iii) if the customer has an accumulation meter installed and the export meter reading has been obtained by the retailer, the export meter reading;</p> <p>(d) the number of days covered by the bill;</p> <p>(e) the dates on which the account period begins and ends, if different from the range of dates of the metering supply period or the range of dates of the metering supply period have not been included on the bill already;</p> <p>(h) the applicable tariffs;</p> <p>(f) the amount of any other fees or charges and details of the service provided;</p> <p>(g) the average daily cost of consumption, including charges ancillary to the consumption of electricity, unless the customer is a collective customer;</p> <p>(h) the average daily consumption unless the customer is a collective customer;</p> <p>(i) a meter identification number (clearly placed on the part of the bill that is retained by the customer);</p> <p>(j) the amount due;</p> <p>(k) the due date;</p> <p>(l) a summary of the payment methods;</p> <p>(m) a statement advising the customer that assistance is available if the customer is experiencing problems paying the bill;</p> <p>(n) a telephone number for billing and payment enquiries;</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>(o) a telephone number for complaints;</p> <p>(p) the contact details for the electricity ombudsman; and</p> <p>(q) the distributor's 24 hour telephone number for faults and emergencies;</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
155A	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 21(1)</p>	<p>In addition to any information required to be included on a customer's bill under another provision of this code, a retailer must include the information set out in subclauses 21(2), (3), (4), (5) and (6).</p>	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of five sample customer bills, we noted that the following contents available as required by clause 21 of the Code of Conduct:</p> <p>(a) Supply address;</p> <p>(b) Customer's name and account number;</p> <p>(c) Meter identification number (if relevant).</p> <p>(d) Start and end date of the supply period;</p> <p>(e) Number of days covered by the bill;</p> <p>(f) Customer's consumption details;</p> <p>(d) Average daily consumption.</p> <p>(e) Amount due;</p> <p>(f) Current meter reading each time band in the time of use tariff;</p> <p>(g) Applicable tariffs;</p> <p>(e) Amount of any arrears or credit standing to the customer's name;</p> <p>(f) the amount of any other fees or charges and details of the service provided in connection with those fees or charges;</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
156	Electricity Industry Act, section 82 Code of Conduct, clause 21(9)	If a retailer wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, no later than the next bill in the customer's billing cycle.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and walkthrough of Horizon Power billing procedures, we noted it is an automated process within Velocity that when debt transfer request is put through, the customer is notified of the amount of the historical debt and its basis in the customer's next bill.</p> <p>The process of identifying a customer with historical debt is often dependent on the customer self-identifying themselves as having previous debts with Horizon Power, usually from a previous supply address (es), or from searches on same account name performed by the CSRs upon account creation.</p> <p>Historical information, including outstanding debt, can then be automatically transferred to the new customer account within Velocity which will allow historical debt to be reflected in the customer's next bill. A historical debt will also be identified via the credit management cycle where prior to an account being referred to the mercantile agency, a Velocity check is performed for any new or existing accounts owned by the same customer. If customer has active account(s) then a full ID match or contact is required to confirm transfer debt.</p> <p>Further through sample testing five instances of historical debt transfer during the audit period, we noted that Horizon Power has notified the customers in the following bill.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
157	Electricity Industry Act, section 82 Code of	Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following:	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we noted using AMI meters, Horizon Power has automated controls in place to base the bill on one of the outlined methods outlined below:		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Conduct, clause 4.6	<ul style="list-style-type: none"> the distributor's or metering agent's reading of the meter at the customer's supply address; the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(b); or if the connection point is a Type 7 connection point, the procedure is set out in the metrology procedure or Metering Code, or as set out in any applicable law. 	<ul style="list-style-type: none"> Horizon Power's reading of the meter at the customer's supply address; and If the connection point is a type 7 connection point, the procedure as set out in the metrology procedure or Metering Code, or as set out in any applicable law. <p>Horizon Power does not accept customer readings of meters for bills. Using AMI meters, Horizon Power is able to gather actual usage consumption data at six hourly intervals, which is uploaded into mData21 systems overnight where it is subsequently validated and pushed into Velocity.</p> <p>Bills will then be generated on a standard bill template using the supplied actual usual data. Through review of a standard bill, we noted that Horizon Power based the bill on a meter reading generated by Horizon Power's AMI meter.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
157A	Electricity Industry Act, section 82 Code of Conduct, clause 22(1)	A retailer must base a customer's bill on the criteria specified in 22(1).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of one sample customer bill, we have noted that customer bill has been prepared based on energy data provided for the relevant meter at the customer's supply address provided by the distributor or metering data agent.</p> <p>On further, clause 5 of Horizon Power Non-standard form contract Terms and conditions MyPower for small use customers (electricity) define the basis of calculation of electricity use of customer.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
157B	Electricity Industry Act, section 82 Code of Conduct, clause 22(2)	A bill will be taken to comply with subclause 21 (1)(a) if the bill reflects a smoothing or similar arrangement that has been entered into between the retailer and the customer.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we were informed that there has been no such bill smoothing arrangement provided to customers during the review period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
158	Electricity Industry Act, section 82 Code of Conduct, clause 22(3)	If a retailer is required to comply with subclause 22(1)(a), the retailer must use its best endeavours to ensure that an actual value is obtained as frequently as required to prepare its bills.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Manager of Metering Services, and review of Automated meter reading process & photo of non-AMI meter, Bi-directional Meter - Mdata21 - Screenshots, Horizon Power has implemented following controls to use its best endeavours to ensure that an actual value is obtained as frequently as required to prepare its bills.</p> <ul style="list-style-type: none"> • Horizon power has installed AMI meters to obtain energy data readings from the metering installations with required communication and transfers the data into mData21 every 6 hours. • In case the meter reading is not obtained from the meter in 8 months, a must-read service order is raised to obtain the physical reading from the metering point at the supply address. • On review of one sample of Must-read service order, photo of non-AMI meter, and mdata extract, we noted that a meter supports that an actual value is obtained as frequently as required to prepare its bills. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
158A	Electricity Industry Act, section 82 Code of Conduct, clause 22(4)	The retailer must ensure that the customer is provided with a written record of any method agreed between the retailer and the customer under subclause 22(1)(c)	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of a non-standard contract, we noted that basis of raising the electricity bill is documented in clause 6 of Non-standard contract as follows:</p> <ul style="list-style-type: none"> • Horizon Power will raise the bill once a month or once every two months and customer pay the total amount payable for each bill by the due date specified in that bill. • The due date will be at least 12 business days from the date of the bill. • Out the range of payment options can be chosen from referring to customer bill, by visiting Horizon Power website or by calling Horizon Power customer service centre. <p>Therefore, Horizon Power has complied with this obligation.</p>		
159	Electricity Industry Act, section 82 Code of Conduct, clause 4.8(1)	If a retailer is unable to reasonably base a bill on a reading of the meter, a retailer must give the customer an estimated bill.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that the majority of Horizon Power customers are connected to AMI meters.</p> <ul style="list-style-type: none"> • All AMI meters provide automatic actual reads which are fed through to Horizon Power's metering system, mData21. In the instance where a customer is not connected to an AMI meter, Horizon Power will endeavour to provide a bill based on a meter reading. • If Horizon Power is unable to reasonably base a bill on a reading of the meter, they will provide an estimated bill as outlined in 5.1(d) of the SFC. • All customer's bills are automatically generated through Velocity using a standard and estimated bill template. On review of one sample estimated bill, we noted that Horizon Power will provides an estimated bill, that clearly states: <ul style="list-style-type: none"> - That the bill is based off an estimated read; - The estimated meter reading; - The basis of estimation; - The reason for the estimation; and that the customer may request a meter reading; and 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>- Verification of a meter reading.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
160	Electricity Industry Act, section 82 Code of Conduct, clause 23(1)	If a retailer has based a customer's bill on an estimation, a retailer must clearly specify on the bill the information required under subclause 23(1).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted the majority of Horizon Power customers are connected to AMI meters. All AMI meters provide automatic actual reads which are fed through to Horizon Power's metering system, mData21.</p> <p>In the instance where a customer is not connected to an AMI meter, Horizon Power will endeavour to provide a bill based on a meter reading. If Horizon Power is unable to reasonably base a bill on a reading of the meter, they will provide an estimated bill as outlined the customer contracts. All customer's bills are automatically generated through Velocity using a standard and estimated bill template.</p> <p>Through review of one sample of estimated bill we noted that following information has been provided in the estimated customer bill in line with clause 23 of the code of conduct:</p> <ul style="list-style-type: none"> • the basis of the estimation; • the reason for the estimation; and • the customer may request a meter reading. <p>Therefore, Horizon Power has complied with this obligation.</p>		
161	Electricity Industry Act, section 82 Code of Conduct, clause 23(2)	On request, a retailer must provide to a customer of the basis and the reason for the estimation.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted the majority of Horizon Power customers are connected to AMI meters. All AMI meters provide automatic actual reads which are fed through to Horizon Power's metering system, mData21.</p> <p>In the instance where a customer is not connected to an AMI meter, Horizon Power will endeavour</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>to provide a bill based on a meter reading. If Horizon Power is unable to reasonably base a bill on a reading of the meter, they will provide an estimated bill as outlined the customer contracts. All customer's bills are automatically generated through Velocity using a standard and estimated bill template.</p> <p>Through review of one sample of estimated bill we noted that following information has been provided in the estimated customer bill in line with clause 23 of the code of conduct:</p> <ul style="list-style-type: none"> • the basis of the estimation; • the reason for the estimation; and • the customer may request a meter reading. <p>Further we understand that CSR can provide more information on customer request basis and reason of estimation.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
162	Electricity Industry Act, section 82 Code of Conduct, clause 4.9	In accordance with clause 4.19, if a retailer gives a customer an estimated bill and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that if a meter is subsequently read, the retailer must include an adjustment on the next bill to take into account the actual meter reading.</p> <p>Velocity automates the adjustment once the actual meter reading is uploaded from mData21. The next bill will be generated with new adjusted amount.</p> <p>On review of one sample of a subsequent actual bill issued to adjust for a previous estimated read, noted that the adjustment was appropriately reflected on the actual bill.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
163	Electricity	If a customer satisfies	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 82 Code of Conduct, clause 24(2)	the requirements specified in subclause 24(1), a retailer must use its best endeavours to replace an estimated bill with a bill based on an actual reading.	<p>Through interviews with the Retail Operations Manager and review of Horizon power Billing Overview process, we noted that, customer is required to provide access their electricity meters.</p> <p>If there is no access to the meter, the distributor is required to provide the retailer an 'estimated reading.</p> <p>It was confirmed by the Customer Service and Community team that Horizon Power had not been requested by a customer to replace an estimated bill with a bill based on an actual reading during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
165	Electricity Industry Act, section 82 Code of Conduct, clause 4.11(2)	If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power provides refund for any reasonable charges for testing a meter to a customer if a meter is found to be defective.</p> <p>If a customer contact Horizon Power in regard to a high bill or suspected faulty meter, Horizon Power will not charge the customer prior to completing the meter test.</p> <p>If the meter is found to be faulty, Horizon Power will refund the customer via their refund process. The Retail Operations Manager confirmed there were no meters tested as faulty during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
166	Electricity Industry Act, section 82	If a retailer offers alternative tariffs and a customer meets the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through discussion with the Retail Operations Manager, we noted that Horizon Power has following		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 25(2)	circumstances in subclause 25(1)(a) and (b), the retailer must transfer the customer to the other tariff within 10 business days of the customer satisfying subclause 25(1)(b).	<p>controls to comply with clause 25 of the Code of Conduct:</p> <ul style="list-style-type: none"> On a monthly basis the regional teams manually monitor a Power BI report that outlines whether a customer's usage entitles them to a more cost-effective tariff, or whether they are no longer eligible for that tariff. Any customers affected by Variations in tariffs are informed of the variation no later than the next bill in the customer's billing cycle. On review of one sample request for change in Tariff we noted that customer is transferred to a new tariff within 10 business days. The effective date of tariff change is either the date when customer date requested or the date when meter reading is obtained. <p>Therefore, Horizon Power has complied with this obligation.</p>		
166A	Electricity Industry Act, section 82 Code of Conduct, clause 25(3)	If a customer transfers from one tariff to another under clause 25, the effective date is as subscribed under subclause 25(3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through discussion with the Retail Operations Manager, we noted that Horizon Power has following controls to comply with clause 25 of the Code of Conduct:</p> <ul style="list-style-type: none"> On a monthly basis the regional teams manually monitor a Power BI report that outlines whether a customer's usage entitles them to a more cost-effective tariff, or whether they are no longer eligible for that tariff. Any customers affected by Variations in tariffs are informed of the variation no later than the next bill in the customer's billing cycle. On review of one sample request for change in Tariff we noted that customer is transferred to a new tariff within 10 business days. The effective date of tariff change is either the date when customer date requested or the date when meter reading is obtained. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
167	Electricity Industry Act, section 82 Code of Conduct, clause 26(2)	If a customer is no longer eligible to receive a tariff, a retailer must notify the customer prior to changing the customer to another tariff.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted on a monthly basis the regional teams monitor a Power BI report that outlines whether a customer's usage entitles them to a more cost-effective tariff, or whether they are no longer eligible for their current tariff.</p> <p>Customer's accounts are reviewed on a twelve-month rolling basis. If a customer is subject to a change in tariff, Horizon Power will inform CSR who will generate a Change of Tariff Rates Letter which outlines:</p> <ul style="list-style-type: none"> • The current tariff the client is on; • The proposed tariff that the customer will be transferred to; and • The applicable supply charge of the proposed tariffs. <p>Therefore, Horizon Power has complied with this obligation.</p>		
168	Electricity Industry Act, section 82 Code of Conduct, clause 4.14(1)	If a customer requests a retailer to issue a final bill at the customer's supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer's request.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample issue of final bill and move out request, we noted that Horizon Power has controls in place to issue a final bill at the customer's supply address, Horizon Power uses reasonable endeavours to arrange for that bill in accordance with the customer's request as per clause 4.14 of the Code of Conduct as follows:</p> <ul style="list-style-type: none"> • Through Horizon Power's use of AMI Meters, CSRs are able to raise a request for de-energisation and a subsequent final bill to be issued through Velocity upon request by a customer. • AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address. • We also noted that they endeavour to post the final invoice to the customer's new address, regardless of whether they are supplying to the new address. • If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>property on the day of the move out request to perform a manual final read.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
169	Electricity Industry Act, section 82 Code of Conduct, clause 4.14(2)	Subject to subclause 4.14(3), if a customer's account is in credit at the time of account closure, a retailer must, in accordance with the customer's instructions, transfer the amount of credit to another account that the customer has with the retailer or a bank account nominated by the customer, within 12 business days or other agreed time.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retails Operations Manager, we were informed that when a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run. On review of an account in credit at time of closure and refund process noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve days of receiving the instructions complying with clause 4.14 (2) of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
170	Electricity Industry Act, section 82 Code of Conduct, clause 4.14(3)	If a customer's account is in credit at the time of account closure and the customer owes a debt to a retailer, the retailer may use that credit to offset the debt owed to the retailer by giving the	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place if a customer requests a final bill, it is issued in accordance with the request.</p> <ul style="list-style-type: none"> AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address and a final bill is issued accordingly. If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		customer written notice. If any amount remains after the set off, the retailer must ask the customer for instructions to transfer the remaining amount in accordance with subclause 4.14(2).	<ul style="list-style-type: none"> When a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power contacts the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run. Further, we noted that there was no such instance wherein adjustment was done, and credit was required to be made in customer's account. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
171	Electricity Industry Act, section 82 Code of Conduct, clause 27(1)	<p>If a customer, after receiving a bill, disputes the amount to be paid, the retailer must review the bill on request by the customer, subject to the customer paying:</p> <ul style="list-style-type: none"> that portion of the bill under review that the customer and the retailer agree is not in dispute; an amount equal to the average amount of the customer's bill over the previous 12 months (excluding 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample on high bill complaint we noted that Horizon Power has controls in place for customer request for a bill review.</p> <ul style="list-style-type: none"> Velocity allows for a manual suppression to be placed on a customer's entire bill should a complaint be lodged. CSRs are instructed to record a description of the complaint at the time the complaint is made and instruct the customer on how the complaint will be dealt with. The bill review will be conducted immediately if reported over the phone, with the customer agreeing to pay the portion of the bill not in dispute. If reported via the customer website, the CSR will contact the customer, and subject to the customer agreeing to pay the portion of the bill not in dispute, the review will be conducted. On review of one sample customer bill review request, we noted that Horizon Power raised a bill review as requested by the customer and placed the customers on a billing suppression within adequate time frames. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		the bill in dispute).			
172	Electricity Industry Act, section 82 Code of Conduct, clause 27(2)(a)	If a retailer has reviewed a customer's bill and is satisfied that the bill is correct, the retailer may require the customer to pay the amount outstanding (if any). The retailer must advise the customer that the customer may request for a meter test and also the existence and operation of the retailer's standard complaints and dispute resolution procedures and details about making a complaint to the electricity industry ombudsman.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place to ensure that following a bill review, if the bill is found to be correct, Horizon Power may charge the unpaid amount to the customer.</p> <p>It was noted that Horizon Power has in place call scripts to confirm that CSRs to contact customers by phone or e-mail to inform them of the outcome of a bill review and that they may request a meter test, as well as the internal complaints handling process, which is detailed on their website. Additionally, they will be informed that the matter can be handled by the Ombudsman if they so wish.</p> <p>Once the review has been completed, the account suppression will be removed, and a bill will be generated with the account balance, including the unpaid amount if the bill is correct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
173	Electricity Industry Act, section 82 Code of Conduct,	If a retailer has reviewed a customer's bill and is satisfied that the bill is incorrect, the retailer must comply with clause 29 or 30 as the case	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample of adjustment of bill, we noted Horizon Power has controls in place to adjust a customer's bill if a bill review is found to be incorrect.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 27(2)(a)	requires and may require the customer to pay the amount (if any) of the bill that is outstanding.	<p>If a bill review found be incorrect, and a subsequent adjustment owing to the customer needs to be made, Horizon Power will apply this credit amount directly to the customer's account through Velocity, where bills are automatically generated showing the amount of credit applied.</p> <p>Customers may request to obtain a refund for the credit amount via EFT or cheque. When a request for refund is made, CSR's process EFT refunds and cheques within twelve business days of receiving the instructions.</p> <p>If it is noted that the bill relates to an amount undercharged, Horizon Power will contact the customer once the issue has been identified, and offer the following:</p> <ul style="list-style-type: none"> • Time to pay the bill through an instalment plan covering at least the period over which the undercharging occurred; • The amount shall not earn interest, unless the customer does not pay by the due date and has not entered into an instalment plan; • The amount will be limited to no more than the amount undercharged in the twelve months prior to the date on which the retailer notified the customer that undercharging occurred; and • Horizon Power will notify the customer of the amount to be recovered no later than the next bill, together with an explanation of that amount. <p>Therefore, Horizon Power has complied with this obligation.</p>		
174	Electricity Industry Act, section 82 Code of Conduct, clause 27(3)	A retailer must inform a customer of the outcome of the review of a bill as soon as practicable after it is completed.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample high bill enquiry, we noted Horizon Power has controls in place wherein customers are notified of the outcome of a bill review as soon as practical.</p> <p>A request for a bill review is treated by Horizon Power as an expression of dissatisfaction and therefore the Complaints process is followed. The Customer Complaints Process notes that all complaints must be resolved within 15 business days.</p> <p>When a customer complaint is raised, it is logged in Velocity with the date the complaint was</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>received. CSRs are under guidance to make an initial response immediately or within in one business day and the resolution is to be sought within 15 days from the date the complaint was received. Velocity is designed to generate a pop-up warning message whenever an account is accessed whilst a complaint is active. If a complaint reaches ten days, an overdue notice will appear. When a bill is reviewed and a review is complete, CSR's advises customers of the outcome of the review immediately.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
175	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 27(4)</p>	<p>If a retailer has not informed a customer of the outcome of the review of a bill within 20 business days from the date of receipt of the request for review, the retailer must notify the customer with notification of the status of the review as soon as practicable after the expiration of that period.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and one sample communication email with customers when bill review could not be completed within 20 days, we noted Horizon Power has controls in place to confirm that customers are notified of the outcome of a bill review as soon as practicable. A request for a bill review is treated by Horizon Power as an expression of dissatisfaction and therefore the Complaints process is followed.</p> <p>The Customer Complaints Process notes that all complaints must be resolved within 15 business days. When a customer complaint is raised, it is logged in Velocity with the date the complaint was received. CSRs are under guidance to make an initial response immediately or within in one business day, with the resolution to be provided within 15 days from the date the complaint was received. Velocity is designed to generate a pop-up warning message whenever an account is accessed whilst a complaint is active. If a complaint reaches ten days, an overdue notice will appear.</p> <p>When a bill is reviewed and a review is complete, CSRs will advise customers of the outcome of the review immediately via their preferred communication method.</p> <p>Review of the overdue complaints report noted that one customer who had requested a bill review exceeded the 20-day notification of status period, and the complaint was still under investigation, however Horizon Power had communicated to the customer within 20 business days.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
175A	Electricity Industry Act, section 82 Code of Conduct, clause 28(1)	If a customer, after receiving a bill, requests that the energy data be checked or the meter be tested, the retailer must arrange for a check of the energy data or testing of the meter (as the case requires).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that Horizon Power has following controls in place to comply with clause 28 of the Code of Conduct:</p> <ul style="list-style-type: none"> • Requests for meter testing is received by the Customer Service and Community team and processed by metering team and field agents. • Once meter testing is completed, the results of meter testing is communicated to the customer with the test report. <p>Through review of one sample request from customer on meter test, we noted that customer request has been processed and test results are communicated to the customer.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
175B	Electricity Industry Act, section 82 Code of Conduct, clause 28(3)	If the energy data is checked and found to be incorrect or the meter is tested and found to be defective, the retailer must refund any payment made under subclause 28(2).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that if the meter found to be faulty, Horizon Power will refund the meter test amount to the customer's account in Velocity, with the amount appearing on the customer's next bill, as well as an explanation of the amount.</p> <p>Through further discussions with the Retail Operations Manager, we noted during the audit period, there were no instances of meter test failed amount that had to be refunded to customers.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
176	Electricity Industry Act, section 82 Code of	If a retailer proposes to recover an amount undercharged a retailer must do so in the manner specified in	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that any amount of undercharge will be added to a customer's existing account.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
	Conduct, clause 29(1)	subclause 29(1).	<p>When a defective meter is found to be faulty, Horizon Power will add the undercharge to the customer's account in Velocity, with the amount appearing on the customer's next bill, as well as an explanation of the amount.</p> <p>Horizon Power does not backdate undercharges more than twelve months. Horizon Power does not charge interest on debt, and through Velocity manual suppression systems, a late payment fee will not be applied. If a customer requires an instalment plan to repay the amount owed, Horizon Power will provide one covering a period at least equal to the period over which the recoverable undercharging occurred.</p> <p>Through interviews with the Retail Operations Manager, we noted that there were no instances of Horizon Power attempting to recover any amount of undercharged for a defective or faulty meter, or otherwise during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>					
177	Electricity Industry Act, section 82 Code of Conduct, clause 30(1)	<p>If a customer (including a customer who has vacated the supply address) has been overcharged the retailer must:</p> <ul style="list-style-type: none"> • use its best endeavours to inform the customer of the amount overcharged 	<table border="1"> <tr> <td data-bbox="775 922 1122 994">Priority: 5</td> <td data-bbox="1122 922 1462 994">Control Adequacy: N/P</td> <td data-bbox="1462 922 2007 994">Compliance Rating: N/R</td> </tr> </table> <p>Through interviews with the Retail Operations Manager, we noted Horizon Power completes the following if a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> • If there is an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must-read service order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and • Through Velocity, any overcharge amount will be automatically credited to the customer's account and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque. 			Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		<p>within 10 business days after the retailer becomes aware of the overcharging; and</p> <ul style="list-style-type: none"> subject to this clause ask the customer for instructions for the credit or repayment of the amount. 	<p>Through further discussions with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error in processing of meter data for preparation of bills.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
178	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 30(2)</p>	<p>If a retailer receives instruction under subclause 30(1), the retailer must deal with the amount overcharged in accordance with the customer's instructions within 12 business days after receiving the instructions.</p>	<p>Priority: 4</p>	<p>Control Adequacy: N/P</p>	<p>Compliance Rating: N/R</p>
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power completes the following if a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> If there is an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must-read service order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and Through Velocity, any overcharge amount will be automatically credited to the customer's account and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque. <p>Through further discussions with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible for.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
179	Electricity Industry Act, section 82 Code of Conduct, clause 30(3)	If a retailer does not receive instructions under subclause 30(1) within 5 business days after making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's next bill.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power completes the following if a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> • If there is an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must-Read Service Order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and • Through Velocity, any overcharge amount will be automatically credited to the customer's account and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque. <p>Through interviews with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible for.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
180	Electricity Industry Act, section 82 Code of Conduct, clause 4.18(6)	Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power endeavours to credit any amounts less than \$100 on the customer's next bill through an automatic payment to the customer's account via Velocity, with the payment appearing on the customer's next bill.</p> <p>If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque within 12 business days of receiving the instructions. If they do not receive instructions within 12 business days, they will automate the refund as a credit on the customer's account.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>Through further discussion with Retail Operations Manager, we were informed that there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
181	Electricity Industry Act, section 82 Code of Conduct, clause 30(6)	Despite subclauses 30(1) to (5), if a customer has been overcharged and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use the amount of the overcharged to set-off the debt.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power has following controls in place:</p> <ul style="list-style-type: none"> • Horizon Power will automatically use an overcharged amount to offset a debt owed through Velocity. It will appear as a credit on the account and reflect on the customer's next bill, sufficiently providing written notice to the customer • If there is an amount remaining after offsetting the debt, Horizon Power will endeavour to contact the customer and offer a refund via EFT or cheque within twelve business days. <p>Through further discussions with the Retail Operations Manager, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
181A	Electricity Industry Act, section 82 Code of Conduct,	Subclause 30(6) does not apply if the customer is a customer experiencing financial hardship.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power has following controls in place:</p> <ul style="list-style-type: none"> • Horizon Power will automatically use an overcharged amount to offset a debt owed through Velocity. It will appear as a credit on the account and reflect on the customer's next bill, 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 30(7)		<p>sufficiently providing written notice to the customer;</p> <ul style="list-style-type: none"> If there is an amount remaining after offsetting the debt, Horizon Power will endeavour to contact the customer and offer a refund via EFT or cheque within twelve business days. <p>Through further discussions with the Retail Operations Manager, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
181B	Electricity Industry Act, section 82 Code of Conduct, clause 30(8)	If there remains an amount in credit after a set-off under subclause 30(6), the retailer must deal with the amount in accordance with subclauses 30(1) to (4) (depending on the amount that remains in credit).	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power has following controls in place:</p> <ul style="list-style-type: none"> Horizon Power will automatically use an overcharged amount to offset a debt owed through Velocity. It will appear as a credit on the account and reflect on the customer's next bill, sufficiently providing written notice to the customer If there is an amount remaining after offsetting the debt, Horizon Power will endeavour to contact the customer and offer a refund via EFT or cheque within twelve business days. <p>Through further discussions with the Retail Operations Manager, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
182	Electricity Industry Act, section 82	If a retailer proposes to recover an amount of an adjustment which does	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of standard form of contract, we</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 4.19(1)	not arise due to any act or omission of a customer, the retailer must comply with the requirements specified in subclause 4.19(1).	<p>noted that Horizon Power has following controls to comply with clause 4.19(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> • Horizon Power only seeks to recover an undercharged amount that has occurred within the last 12 months, and will not backdate greater than 12 months from the date the customer has been notified of the undercharge; • Through Velocity, Horizon Power will automatically apply the undercharge to the customer's account, and through the automated billing process, this amount will appear on the customer's next standard bill; • The customer's account will be suppressed for any credit actions for 28 days, which will negate a late payment fee; and • If required, Horizon Power will offer an instalment plan to customer's covering at least the period in relation to the adjustment. <p>Therefore, Horizon Power has complied with this obligation.</p>		
183	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct 2018, clause 4.19(2)</p>	<p>If the meter is read under either clause 4.6 or clause 4.3(2)(d), and the amount of the adjustment is an amount owing to the customer, the retailer must:</p> <ul style="list-style-type: none"> • use its best endeavours to inform the customer within 10 business days; and subject to subclauses 4.19(5) and 4.19(7), 	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power applies a credit to a customer's account in the occurrence of an adjustment or overcharge.</p> <p>If a customer requests a meter to be read, and a subsequent adjustment owing to the customer needs to be made, Horizon Power applies this credit amount directly to the customer's account through Velocity, where bills are automatically generated showing the amount of credit applied.</p> <p>Customers will be informed within ten business days of the adjustment and Horizon Power will contact customers for instructions on how to transfer the remaining amount, including a refund by EFT or cheque. When a request for refund is made, CSR's are trained to process EFT refunds and cheques.</p> <p>On one sample review of credit account of a customer and a subsequent credit refund being processed noted that Horizon Power informed customers within the timeframe specified under the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		ask the customer for instructions about the repayment of the amount.	Code of Conduct, clause 4.19(2) and processed a refund to the customer as per the customers refund instructions. Therefore, Horizon Power has complied with this obligation.		
183A	Electricity Industry Act, section 82 Code of Conduct 2022, clause 31(1)	If a customer requests the retailer to arrange for the preparation and issue of a final bill for the customer's supply address, the retailer must use its best endeavours to arrange for a meter reading and the preparation and issue of a final bill for the supply address in accordance with the customer's request.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retails Operations Manager and review of one sample issue of final bill and move out request, we noted that Horizon Power has controls in place to issue a final bill at the customer's supply address, Horizon Power uses reasonable endeavours to arrange for that bill in accordance with the customer's request.</p> <p>Through Horizon Power's use of AMI Meters, CSRs are able to raise a request for de-energisation and a subsequent final bill to be issued through Velocity upon request by a customer.</p> <p>AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address.</p> <p>On review of Horizon Power Billing Overview, we noted that they endeavour to post the final invoice to the customer's new address, regardless of whether they are supplying to the new address.</p> <p>If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
183B	Electricity Industry Act, section 82 Code of Conduct	Unless subclause 31(4) applies, if a customer's account is in credit at the time of the account closure, a retailer must, at the time of the final	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place if a customer requests a final bill, it is issued in accordance with the request.</p> <p>AMI meters take a reading at midnight on the date the customer advises they will be vacating the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	2022, clause 31(2)	bill, ask the customer for instructions to transfer the credit amount either to another account the customer has or will have with the retailer, or a bank account nominated by the customer	<p>supply address and a final bill is issued accordingly. If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>When a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run.</p> <p>On review of one sample account in credit at time of closure and refund process noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve days of final billing.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
183C	Electricity Industry Act, section 82 Code of Conduct, clause 31(3)	The retailer must, in accordance with the customer's instructions under subclause 31(2), transfer the amount of the credit within 12 business days after receiving the instructions or another period agreed with the customer.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place if a customer requests a final bill, it is issued in accordance with the request.</p> <p>AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address and a final bill is issued accordingly. If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>When a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run.</p> <p>On review of one sample account in credit at time of closure and refund process noted that the customer requested a refund for the credited account and Horizon Power processed the refund</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>within twelve days of final billing.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
183D	Electricity Industry Act, section 82 Code of Conduct, clause 31(4)	If a customer's account is in credit at the time of account closure and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use the credit to set-off the debt.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power has following controls in place:</p> <ul style="list-style-type: none"> • Horizon Power will provide a notice to customer at the time of final billing and credit if any set-off of previous debt is required. • If there is an amount remaining after offsetting the debt, Horizon Power will endeavour to contact the customer and offer a refund via EFT or cheque within twelve business days. • Through further discussions with the Retail Operations Manager, we noted there were no instances, where set off of debt was performed for any customer during the audit period. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
183E	Electricity Industry Act, section 82 Code of Conduct, clause 31(5)	If after a set-off under subclause 31(4), there remains an amount of credit, the retailer must deal with the amount in accordance with subclauses (2) and (3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place if a customer requests a final bill, it is issued in accordance with the request.</p> <p>AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address and a final bill is issued accordingly. If the customer has a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>When a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run.</p> <p>On review of one sample account in credit at time of closure and refund process noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve days of final billing.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
184	Electricity Industry Act, section 82 Code of Conduct, clause 4.19(3)	If a retailer receives instructions under subclause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and sample review of five cases of customer refunds, we noted that Horizon Power has controls in place to ensure that if there is an adjustment owing to a customer after a meter read, a credit or refund will be applied in accordance with the customer's instructions complying with requirement of clause 4.19(2) and 4.19(3) of the Code of Conduct.</p> <p>Horizon Power endeavours to obtain refund details via phone call, email or text. If refund instructions are received CSRs raise a refund within Velocity and coordinate the refund via either cheque or EFT within twelve business days of receiving the instructions.</p> <p>Sample review of five accounts in credit as a result of an adjustment and a subsequent credit refund being processed, we noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve business days of receiving the instructions.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
184A	Electricity Industry Act, section 82 Code of Conduct,	Despite any other arrangement or agreement that may be in place between the retailer and the customer in relation to	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through discussions with the Retail Operations Manager, we noted that on creation of their account, the default setting will be for customer to receive their bills via paper post. However, customers are given the option to select E-bills (electronic bills) and elect the email account to which they want to</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 32(1)	paying bills, the retailer must allow the customer who has entered into a standard form contract to choose to receive bills, by post as paper bills or by email sent to an email address provided by the customer.	receive their bills which can be done over the phone or when logged into their account online. Therefore, Horizon Power has complied with this obligation.		
185	Electricity Industry Act, section 82 Code of Conduct, clause 4.19(4)	If a retailer does not receive instructions under subclause 4.19(2), within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power has controls in place to ensure that if there is an adjustment owing to a customer after a meter read, a credit or refund will be applied in accordance with the customer's instructions.</p> <p>It is noted that Horizon Power's AMI meters can only overcharge a customer if a meter fails in the network operator's favour. If an account is overcharged, Horizon Power endeavours to obtain refund details via phone call, email or text.</p> <p>If refund instructions are received CSRs raises a refund within Velocity and coordinate the refund via either cheque or EFT within twelve business days of receiving the instructions. If instructions are not received, the amount overcharged is automatically credited to the customer's account through Velocity within five business days. It was confirmed with the Retail Operations Manager, there were no such instance wherein adjustment was done, and credit was required to be made in customer's account.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
186	Electricity Industry Act, section 82 Code of Conduct, clause 4.19(7)	A retailer may, after notifying the customer in writing, use an amount of an adjustment to set off that customer's debt owed to the retailer, provided that the customer is not a residential customer in payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with that amount in accordance with subclause 4.19(2) or, if the amount is less than \$100, subclause 4.19(5).	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that if a customer owes debt to Horizon Power, Horizon Power sets the debt with any credit adjustment amount.</p> <p>Prior to offsetting customer's debt with a credit amount, CSRs provide customers written notice of the amount that will be offset. Horizon Power endeavours to credit any amounts less than \$100 on the customer's next bill by applying it to the customer's account through Velocity, with the amount automatically appearing on the customer's next bill.</p> <p>For amounts that exceed \$100, the option to receive a cheque refund must be offered to the customer. Once the request has been made, the payment will be processed within 12 business days and there is not time or monetary limit to the refund. We also understand that there were no such instances wherein customer debt was set off for payment difficulty or hardship customers.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
187	Electricity Industry Act, section 82 Code of Conduct, clause 33	The date by which a bill must be paid must not be earlier than 12 business days from the bill issue date.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and sample customer bill. we noted Velocity is programmed to automatically calculate the due date of the bill to be greater than 12 business days from the dispatch date of the bill as reflected in Horizon Power's Velocity credit cycle.</p> <p>On review of one sample customer bill, we noted that, there was at least 12 business days difference between the due date and the bill date.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
188	Electricity Industry Act, section 82 Code of Conduct, clause 34(1)	A retailer must accept payment for a bill prescribed in subclause 34(1).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power’s sample customer bill template, we noted that Horizon Power accepts the following payment methods which are in line with the requirements of clause 34:</p> <ul style="list-style-type: none"> • Pay in Person (Customer can pay his bill in near post office, Payments may be made by cash or cheque only. A fee may apply.); • Mail; • Centrepay; • Electronically by BPay or Credit Card; and • By telephone by means of credit card or direct debit. <p>Therefore, Horizon Power has complied with this obligation.</p>		
189	Electricity Industry Act, section 82 Code of Conduct, clause 5.3	Prior to commencing a direct debit facility, a retailer must obtain a customer’s verifiable consent and agree with the customer the date of commencement of the facility and the frequency of the direct debits.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that customers who wish to apply for a direct debit account may do so online or over the phone with a CSR. A Direct debit form is required to be completed regardless of how a customer applies for a direct debit account and returned to Horizon Power to constitute verifiable consent.</p> <p>On review of one sample for direct debit customer, we noted that a direct debit consent was obtained and recorded in Velocity.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
190	Electricity Industry Act, section 82	A retailer must accept payment in advance from a customer. This	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and review of Horizon Power Financial		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 35(1) to (3)	will not require a retailer to credit any interest to the amounts paid in advance. The amount of \$20 is the minimum amount a retailer is required to accept from a customer (although a retailer may accept lower amount if it thinks fit).	Hardship Policy we noted that Horizon Power will accept payments in advance at no additional cost to enable customer to receive a reduced bill. Further customer can make advanced payments using Centrepay. Customers can make an advance payment which will be credited to their account on Velocity and is automatically applied to the next bill to offset any future amounts. Also, we noted that there is no minimum limit requirement of advance and customers are entitled to pay any amount as advance. Therefore, Horizon Power has complied with this obligation.		
190A	Electricity Industry Act, section 82 Code of Conduct, clause 35(4) to (6)	A retailer may determine an amount (a maximum credit amount) that a customer's account may be in credit and must publish the maximum credit amount on its website. The maximum credit amount must not be less than \$100.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and on review of Horizon Power Financial Hardship Policy we noted that Horizon Power will accept payments in advance at no additional cost to enable customer to receive a reduced bill. Further customer can make advanced payments using Centrepay. Customers can make an advance payment which will be credited to their account on Velocity and is automatically applied to the next bill to offset any future amounts. Also, we noted that there is no minimum limit or maximum amount requirement of advance and customers are entitled to pay any amount as advance. Therefore, Horizon Power has complied with this obligation.		
191	Electricity Industry Act, section 82 Code of Conduct,	If, due to illness or absence, a residential customer is unable to pay by way of the methods described in	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power will redirect a customer's bill to an alternate mailing address, at the request of a customer and with approval from the third person at no charge.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 5.5	clause 5.2, a retailer must offer to redirect the customer's bill to a third person at no charge.	Further on review of the Horizon Power's SFC, NSC and Financial Hardship Policy, we noted that Horizon Power outlines the ability for customers to redirect their bill to a third party in the event a customer is having payment difficulties or experiencing financial hardship. Horizon Power's Financial Hardship Policy defines payment difficulties as including 'personal illness causing minor financial issues' and instructs Horizon Power employees to offer redirection of bills to a third person if a customer requires it. Therefore, Horizon Power has complied with this obligation.		
191A	Electricity Industry Act, section 82 Code of Conduct, clause 36	A retailer must redirect a customer's bill to a different address (including an email address or a different email address) on the customer's request and at no charge.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power will redirect a customer's bill to an alternate mailing address, at the request of a customer and with approval from the third person at no charge. A customer can connect with Horizon Power CSR to provide the alternate email address details where a customer bill needs to be emailed. A CSR will record the alternate email address in Velocity and share an email based on the customer request. Therefore, Horizon Power has complied with this obligation.		
192	Electricity Industry Act, section 82 Code of Conduct, clause 37(1)	A retailer must not charge a residential customer a late payment fee in connection with the payment of a bill in the circumstances specified in subclause 37(1).	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power has controls in place to ensure that late payment fees are not charged to customers in the following situations as outlined in the obligation and clause 37(1) through a 28-day manual account suppression on the customer's account: <ul style="list-style-type: none"> • If a residential customer has an unresolved complaint related to the non-payment of a bill to Horizon Power or the electricity ombudsman or a resolved complaint in their favour; • If a customer is deemed to be having financial hardship; or 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> If a customer has a payment extension and has paid the bill by the new due date or an instalment plan in place and they are making payments in accordance with the details of the plan. <p>Following the 28-day manual account suppression:</p> <ul style="list-style-type: none"> CSRs place a manual calendar reminder to review the complaint prior to the lapse of 28 days manual account suppression and extend the account suppression if necessary. If after the 28-day period, Horizon Power has assessed a customer to be experiencing payment difficulties or financial hardship, a flag will remain on the customer's account refraining Horizon Power from charging a late payment fee. For accounts registered under a concession, Velocity has inbuilt system controls attached to customers' accounts to ensure customers are not charged a late payment fee, provided the customer has not received two or more reminder notices in the previous twelve months. <p>Also, through review of Annual Compliance Reports and complaints report covering 2567 complaints from April 2020 to June 2023, we noted no non-compliance of this compliance requirement. However, we noted that there are no documented work instructions/guideline available for complying with 37(1) of the Code of Conduct.</p> <p>It was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power has complied with the obligation for the period.</p>		
193	Electricity Industry Act, section 82 Code of Conduct, clause 37(2)	If a retailer has charged a late payment fee in the circumstances set out in subclause 37(1)(c)(ii) because the retailer was not aware of the complaint, the retailer must refund the late	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, it was noted that late payment fees are not levied against a customer if there is a current, unresolved complaint on their account (due to the addition of a manual 28-day account suppression). If a late payment fee is charged prior to Horizon Power becoming aware of a customer complaint, the fee will be credited to the customer's account (visible on the next bill) and can be refunded directly via EFT at the customer's request.</p> <p>Also, through review of Annual Compliance Reports and complaints report, we noted no non-</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		payment fee on the customer's next bill (unless the fee is payable under subclause 37(3)).	compliance of this compliance requirement. However, we noted that there are no documented work instructions /guideline available for complying with 37(2) of the Code of Conduct. Therefore, Horizon Power has complied with this obligation.		
193A	Electricity Industry Act, section 82 Code of Conduct, clause 37(3)	If a complaint referred to in subclause 37(1)(c) is not resolved in favour of the customer any late payment fee must be calculated from the date of the retailer's or the electricity industry ombudsman's decision (as the case may be).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not retrospectively apply late payment fees to customers' accounts that have lodged complaints to confirm that Horizon Power complies with this obligation. Also, we understand that this obligation is applicable from Feb 2023 as per the new Code of Conduct, 2022 and it was confirmed by the Retail Operations Manager that there have been no such cases wherein the late payment fees have been applied retrospectively. Through review of Annual Compliance Reports and complaints report, we noted no non-compliance of this compliance requirement. However, we noted that there were no documented work instructions /guideline available for complying with 37(3) of the Code of Conduct. Therefore, Horizon Power has complied with this obligation.		
194	Electricity Industry Act, section 82 Code of Conduct, clause 37(4)	A retailer must not charge an additional late payment fee in relation to the same bill within 5 business days after the day on which the customer receives the previous late payment fee notice.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we were informed that that Horizon's system Velocity's coding is configured to ensure that a customer cannot receive a second late payment fee for the same bill, within five days of the first late payment fee being applied. As such, we were able to confirm from the Retail Operations Manager that no instance of this occurred during the audit period. Also, through review of Annual Compliance Reports and complaints report, we noted no non-compliance of this compliance requirement. However, we noted that there were no documented work instructions /guideline available for complying with 37(4) of		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
195	Electricity Industry Act, section 82 Code of Conduct, clause 37(5)	A retailer must not charge a residential customer more than 2 late payment fees in relation to the same bill or more than 12 late payment fees in a 12-month period.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that that Horizon's system has inbuilt coded controls to ensure that a customer does not receive more than two late payment fees in relation to the same bill or more than twelve late payment fees in a year.</p> <p>As such, we were able to confirm from the Retail Operations Manager that no instance of this occurred during the audit period. Also, through review of Annual Compliance Reports and complaints report, we noted no non-compliance of this compliance requirement. However, we noted that there were no documented work instructions /guideline available for complying with 37(5) of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
196	Electricity Industry Act, section 82 Code of Conduct, clause 37(6)	If a residential customer has been assessed as a customer experiencing financial hardship, a retailer must retrospectively waive any late payment fee charged under the customer's last bill before the assessment was made.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that when a customer is assessed as facing financial hardship, a 28-day account suppression is manually placed on their account to remove them from the billing cycle for this period, as well as ensuring the customer is not subject to any late payment fees. As part of this suppression, if any late payment fees are existing on the account, they will be automatically removed, and the amount credited to the customer's account. Review of one sample customer account showed the automatic credit of the existing late payment fees on the customer's account following their financial hardship assessment outcome. Also, through review of Annual Compliance Reports and complaints report, we noted no non-compliance of this compliance requirement. However, we noted that there were no documented work instructions /guideline available for complying with 37(6) of the Code of Conduct.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
197	Electricity Industry Act, section 82 Code of Conduct, clause 38(1)	A retailer must not require a customer, who has vacated a supply address, to pay for electricity consumed at the customer's supply address in the circumstances specified in subclause 38(1).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted customers have the option of either completing a move out request online, or by contacting Horizon Power by phone and requesting a disconnection from the CSR directly.</p> <p>Once the request has been received, the CSR will raise a move-out notice on Velocity, which in turn raises a service order in mData21 to de-energise the supply address at midnight on the date the customer advised they were vacating the premises. In regard to notice periods, the below was noted complying the requirement of clause 38(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> • If a customer provides five days' notice of their departure, they are not charged for electricity consumed from the date they vacated the supply address; and • If a customer does not provide five days' notice, they will be disconnected within five days of Horizon Power receiving the request. <p>Through sample testing of five customers who vacated the supply address had been finally billed in line with their move out date and hence were not required to pay after move-out.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
198	Electricity Industry Act, section 82 Code of Conduct, clause 38(2)	If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate the supply address, the retailer must not require the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of Horizon Power's SFC, we noted where a customer informs Horizon Power of their eviction or otherwise required to vacate a supply address, they will not charge the customer for electricity consumed from the date that the customer gave notice.</p> <p>Once informed by the customer, the CSR will raise a move-out notice on Velocity, which in turn raises a service order in mData21 to de-energise the supply address at midnight of the date the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.	<p>customer advised they were evicted or required to vacate the premises.</p> <p>On sample review of one final bill issued to the customer and final read service order we noted that customer has charged for the electricity consumed till the date mentioned in customer move-out notice.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
199	Electricity Industry Act, section 82 Code of Conduct, clause 38(4)	Despite subclauses 38(1) and (2), a retailer must not require a previous customer to pay for electricity consumed at the supply address in the circumstances specified in subclause 38(4).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of Horizon Power's SFC, we noted where a customer informs Horizon Power of their eviction or otherwise required to vacate a supply address, they will not charge the customer for electricity consumed from the date that the customer gave notice.</p> <p>Once informed by the customer, the CSR will raise a move-out notice on Velocity, which in turn raises a service order in mData21 to de-energise the supply address at midnight of the date the customer advised they were evicted or required to vacate the premises.</p> <p>On sample review of one final bill issued to the customer and final read service order we noted that customer has charged for the electricity consumed till the date mentioned in customer move-out notice.</p> <p>A customer will not be charged for electricity used post this final read. Velocity has controls in place to prevent two open accounts with the same NMI (National Meter Identifier) meter number at any time - an old account with an NMI number must be closed before a new account can be opened with the same NMI number - thereby preventing a previous customer being billed for consumption from the new contract.</p> <p>During the audit period, there were no other retailers responsible for the supply of electricity to any of Horizon Power's supply addresses.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
200	Electricity Industry Act, section 82 Code of Conduct, clause 39(1)	A retailer must not commence proceedings to recover a debt from a residential customer who has informed the retailer in accordance with clause 40 that they are experiencing payment problems, unless and until the retailer has complied with all the requirements of clause 40 and while a residential customer continues to make payments under an alternative payment arrangement under Part 6.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not attempt to commence proceedings to recover a debt from a customer experiencing payment difficulties or financial hardship to comply with clause 39(1) of the Code of Conduct.</p> <p>Horizon Powers Financial Hardship Policy notes that Horizon Power suspends credit actions, including disconnection and debt recovery procedures for a period of not less than 15 days (28 days) from notification to Horizon Power of payment difficulties or financial hardship.</p> <p>Horizon Power places a manual suppression on accounts experiencing payment difficulties to halt the debt recovery process during the 28-day period. If, after the 28-day period, Horizon Power has assessed a customer to be experiencing payment difficulties or financial hardship, a flag will remain on the customer's account refraining Horizon Power from commencing debt recovery proceedings.</p> <p>No active customers (customers who are not disconnected) are referred to a debt collection agency and hence customers facing payment difficulties are not also referred to a debt collection agency.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
201	Electricity Industry Act, section 82 Code of Conduct, clause 39(2)	A retailer must not recover, or attempt to recover, a debt from a person relating to a supply address other than the customer who the retailer has, or had,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Velocity is designed to confirm that there cannot be two open accounts at any time with the same NMI number. Velocity requires a previous account to be closed, with another reopened should a new customer move-in to the supply address. Debt is not transferred to the new account; therefore, the debt cannot be recovered from the new customer. The debt will remain on the closed account and registered</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		entered into a contract for the supply of electricity to that supply address.	<p>against the previous account owner.</p> <p>On review of one sample customer final bill, we noted that Horizon Power will only recover an outstanding debt from a customer who entered a contract for the supply address.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
201A.	Electricity Industry Act, section 82 Code of Conduct, clause 39(3)	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt, if the retailer obtains the other customer's verifiable consent to the transfer.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place within Velocity to transfer the debt from one customer to another in line with clause 39(3) of the Code of Conduct. Horizon Power only allows to transfer the debt only based on following legal documentation:</p> <ul style="list-style-type: none"> • Power of Attorney as recognised approval of a third party, or • Person can be authorised by the account holder to redirect the bill. • Consent from other customers for debt transfer <p>All authorisation is stored within Velocity - and debt transfer is coordinated within velocity. On review of one bill with a transfer of debt, we noted that Horizon Power transferred debt owed by a customer to a third party as instructed based on the consent from the customer.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
202	Electricity Industry Act, section 82 Code of Conduct, clause 40(1)	Unless subclause 40(2) or (5) applies, if a residential customer informs a retailer that the customer is experiencing payment problems, the retailer must assess whether the	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power performs an assessment of financial hardship when a customer informs them of payment difficulties. Calls from customers are received by a CSR who will note the preliminary details of the customer's payment problems and apply a credit control suppression to the customer's Velocity account, suspending credit activities for 28 business days.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		customer is experiencing financial hardship within 5 business days.	<p>A CSR will then call each customer to obtain further details. Horizon Power aims to complete the hardship assessment process within 2 business days, which is within the 5 business days timeframe required by the Code.</p> <p>We noted the below documentation and guidance is provided to assist in ensuring that the appropriate assessment is performed in line with the timeframes stipulated in the Code:</p> <ul style="list-style-type: none"> • The Financial Hardship Policy is provided to Horizon Power and Computershare (Computershare Utility Services Pty Ltd (i.e. Horizon Power’s outsourced provider for Retail Customer Care Contact and Fault Call Centre and Billing and Collection Services) staff. • This procedure outlines the guidelines, responsibility and obligations in the treatment of customer experiencing financial hardship as required by the Code. • On review of the procedure, we noted that the assessment must be performed within 3 business days. The Retail Operations Manager noted this has intentionally not been changed, as internally, Horizon Power aim to complete the process within 2 business days; • Work Instruction - Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on applying, monitoring, reporting and processing HUGS; and • CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high-level definition and overview of the hardship/HUGS process. <p>On sample testing of five residential customers experiencing payment difficulties or financial hardship during the audit period, we noted all assessments either occurred during the initial call made by the residential customer or within five business days. It was confirmed with the Retail Operations Manager that no customers were referred to a relevant consumer representative during the audit period as all assessments were made by Horizon Power within 5 business days.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
203	Electricity Industry Act,	When undertaking an assessment under subclause 40(1), a	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we noted initial assessments of payment		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 82 Code of Conduct, clause 40(3)	retailer must give reasonable consideration to the information prescribed in subclause 40(3)(a), or advice prescribed in subclause 40(3)(b), given by a relevant consumer representative.	<p>difficulty or financial hardship are performed by CSRs. Through sample review of five payment difficulty and hardship customers, we noted that Horizon Power has following controls to provide reasonable consideration to information provided by the customer:</p> <ul style="list-style-type: none"> • Work Instruction - Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on applying, monitoring, reporting and processing HUGSI • CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. • Through memo logs it was noted that consideration was given to information given by the customer • The samples tested were requests made by the residential customers directly, rather than a relevant consumer representative. <p>Therefore, Horizon Power has complied with this obligation.</p>		
204	Electricity Industry Act, section 82 Code of Conduct, clause 40(4)	Upon request, a retailer must advise a residential customer of the outcome of an assessment, including the reasons for the outcome of the assessment under subclause 40(1).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through discussions with the Retail Operations Manager and review of the Hardship Policy we noted that Horizon Power has following controls in place to comply with clause 40 of the Code of Conduct:</p> <ul style="list-style-type: none"> • If a customer is experiencing payment difficulties, the assessment is conducted immediately, and the customer informed of the outcome of the assessment on the same call. • If a customer is experiencing payment difficulties and qualifies for financial hardship, the initial assessment is conducted immediately, with the details provided to the CSR to complete the application. An assessment will be conducted within five business days, and an application submitted to the DoC (Department of Communities) for the HUGS (Hardship Utilities Grants Scheme) program. Once the assessment has been completed by the DoC, the outcome is communicated through to the CSR who will provide this information to the residential customer. • Work Instruction - Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>applying, monitoring, reporting and processing HUGS;</p> <ul style="list-style-type: none"> CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. <p>On sample testing five Hardship customers, enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Residential customers experiencing payment difficulties were informed of the outcome of their assessment during the initial enquiry to Horizon Power. Residential customers experiencing payment difficulties who qualified for financial hardship were contacted by the CSR with the outcome of the assessment. However, through discussions with the Retail Operations Manager, we noted that there were no such instances where customer requested outcome of the assessment and the assessment carried out under subclause 6.1(1). <p>Therefore, Horizon Power has complied with this obligation.</p>		
204A	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 40(5)</p>	<p>A retailer is not required to undertake an assessment under subclause 40(1) if the retailer has previously undertaken an assessment in relation to the customer unless the customer has indicated that there has been a change in their circumstances since that previous assessment.</p>	<p>Priority: 4</p>	<p>Control Adequacy: N/P</p>	<p>Compliance Rating: N/R</p>
			<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where assessment of customer was carried out as per clause 40(1) and a change in assessment is required thereafter. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
205	Electricity Industry Act, section 82 Code of Conduct, clause 6.2(1)	If a residential customer is referred to a relevant consumer representative under subclause 6.1(1)(b), a retailer must grant a temporary suspension of actions for that customer.	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account.</p> <p>If an assessment cannot be made within five business days and the account is to be referred to a relevant consumer representative to make the assessment, the temporary credit control suspension will continue to be in effect.</p> <p>It was confirmed with the Retail Operations Manager that no customers were referred to a relevant consumer representative during the audit period as all assessments were made by Horizon Power within five (5) business days. Also, on review of five payment difficulty and hardship customers we noted that customer accounts have been suppressed for temporary suspension of actions as per the Code of Conduct, clause 6.2(1).</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
206	Electricity Industry Act, section 82 Code of Conduct, clause 6.2(2)	A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions if the customer informs the retailer about payment problems under clause 6.1 and the customer demonstrates that an appointment with a relevant consumer	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account.</p> <p>If an assessment cannot be made within five business days and the account is to be referred to a relevant consumer representative to make the assessment, the temporary credit control suspension will continue to be in effect.</p> <p>It was confirmed with the Retail Operations Manager that no customers were referred to a relevant consumer representative during the audit period as all assessments were made by Horizon Power within five (5) business days.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		representative has been made.	<p>Also, during sample testing of 5 payment difficulty and hardship customers we noted that customer accounts have been suppressed for temporary suspension of actions as per the Code of Conduct, clause 6.2(1) and clause 6.2(2).</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
207	Electricity Industry Act, section 82 Code of Conduct, clause 6.2(3)	A retailer must allow a temporary suspension of actions for a period of at least 15 business days.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, it was noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account.</p> <p>The CSR does not enter the number of days the account is to be suspended. Velocity is programmed to apply a 28 day suppression once the button is clicked in the system. We noted this temporary suppression applied is more than the required of at least 15 business days stipulated in the Code.</p> <p>On sample testing was five customers enquiring about payment difficulties or financial hardship and all were suppressed for a 28 day period.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
208	Electricity Industry Act, section 82 Code of Conduct, clause 6.2(4)	A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative to allow additional time to assess a residential customer's capacity to pay.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that customers are initially placed on a 28-business day account suppression for all account activities to allow additional time to assess a residential customer's capacity to pay.</p> <p>If the customer requires any further time, the customer request will be forwarded to the Retail Operations Manager for an extension. Generally, the customer will be granted another 28 business days, providing they can cite a reasonable need for extension.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
			<p>Through sample testing of five sample payment difficulty and hardship customers, we noted that</p> <ul style="list-style-type: none"> All requests were given additional time to assess customer’s capacity to pay by manually suppressing customer accounts for 28 days. As all assessments were made within the 28-day period, further extensions were not requested by the customers. <p>Based on interviews and review of documents, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>					
209	Electricity Industry Act, section 82 Code of Conduct, clause 6.3(1)(a)	If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.	<table border="1" data-bbox="775 663 2007 735"> <tr> <td data-bbox="775 663 1122 735">Priority: 1</td> <td data-bbox="1122 663 1462 735">Control Adequacy: B</td> <td data-bbox="1462 663 2007 735">Compliance Rating: 2</td> </tr> </table> <p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted Horizon Power has following controls in place to provide assistance to customers who are assessed as experiencing payment difficulties as follows:</p> <ul style="list-style-type: none"> The suppression of account is placed to suspend all the customer’s credit activities for 28 business days. Advise customers that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship Offered with the option to enter a payment arrangement plan. <p>Customers are offered these options over the phone by the CSRs when they call about payment difficulties or financial hardship. Sample testing conducted for 10 sample customers enquiring about payment difficulties and the following was noted:</p> <ul style="list-style-type: none"> All customers were offered an interest-free payment plan Out of ten samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan. <p>Further, through sample testing of memo logs and payment arrangement letters, it was not</p>			Priority: 1	Control Adequacy: B	Compliance Rating: 2
Priority: 1	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>evidenced whether the residential customers were advised that additional assistance may be available if, due to financial hardship, the residential customer would be unable to meet its obligations under an agreed alternative payment arrangement.</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Reports from 2019-20 to 2021-22 as Horizon Power does not provide one-off additional time to pay to all customers experiencing payment difficulty.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
210	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 6.3(1)(b)</p>	<p>If a residential customer is assessed as experiencing financial hardship, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1)(b) and assistance in accordance with clauses 6.6 to 6.9.</p>	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted Horizon Power controls in place to provide assistance to customers who are assessed as experiencing financial hardship. An overview of the assistance provided to financial hardship customers when applicable is outlined below:</p> <ul style="list-style-type: none"> • Consideration of a reduction in fees, charges and debt on request • Consideration of revising alternative payment options • Additional time to pay a bill. • An interest and fee free payment plan or other arrangement where you are given additional time to pay a bill or pay arrears. • Provision of information relevant to the hardship application. <p>Through sample testing of five hardship and payment difficulties customers, the following was noted:</p> <ul style="list-style-type: none"> • Customers were offered an interest and fee free payment plan or • Other arrangement where they are given additional time to pay a bill or pay arrears. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
211	Electricity Industry Act, section 82 Code of Conduct, clause 41(1)(a)	A retailer must offer the residential customer additional time to pay a bill.	Priority: 1	Control Adequacy: B	Compliance Rating: 2
			<p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted Horizon Power has following controls in place to provide assistance to customers who are assessed as experiencing payment difficulties as follows:</p> <ul style="list-style-type: none"> • The suppression of account is placed to suspend all the customer’s credit activities for 28 business days. • Advise customers that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship • Offered with the option to enter a payment arrangement plan. <p>Customers are offered these options over the phone by the CSRs when they call about payment difficulties or financial hardship. Sample testing conducted for 10 sample customers enquiring about payment difficulties and the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered an interest-free payment plan • Out of ten samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan. <p>Further, through sample testing of memo logs and payment arrangement letters, it was not evidenced whether the residential customers were advised that additional assistance may be available if, due to financial hardship, the residential customer would be unable to meet its obligations under an agreed alternative payment arrangement.</p> <p>This compliance obligation was self-reported as non-compliant in the Annual Compliance Reports from 2019-20 to 2021-22 as Horizon Power does not provide one-off additional time to pay to all customers experiencing payment difficulty.</p> <p>Based on interviews and review of documents, it was concluded that there were generally adequate</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		
212	Electricity Industry Act, section 82 Code of Conduct, clause 41(1)(b)	A retailer must offer the residential customer a payment plan for the amount owing.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operation Manager and review of the Financial Hardship Policy, , we noted Horizon Power offers customers experiencing payment difficulties or financial hardship various payment arrangements.</p> <p>This is processed through Velocity, with a CSR placing a 28 day suspension of activity on the account to assist with the payment arrangement.</p> <p>On sample testing five customers enquiring about payment difficulties or financial hardship, the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered a payment arrangement in line with the Code of Conduct. • The amount to be paid was discussed with the customer, with the CSR taking into account the customers' ability to pay within a certain timeframe <p>Therefore, Horizon Power has complied with this obligation.</p>		
212A	Electricity Industry Act, section 82 Code of Conduct, clause 41(3)	A retailer must offer a residential customer who is assessed as experiencing financial hardship at least a payment plan and assistance in accordance with clause 45 without the need for the customer to make a	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of the Hardship procedure, we noted that the following items have been included in line with Clause 45 of Code of Conduct 2022:</p> <ul style="list-style-type: none"> • a payment plan; • a reduction of the customer's fees, charges or debt. • customer's right to have a bill redirected to a different address (including an email address) at no charge; and • payment methods available to the customer • concessions that may be available to the customer and how to access them 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		request.	<ul style="list-style-type: none"> independent financial counselling services and relevant consumer representatives available to assist the customer; and availability of any other financial assistance offered by the retailer, and how to access this assistance. <p>Therefore, Horizon Power has complied with this obligation.</p>		
213	Electricity Industry Act, section 82 Code of Conduct, clause 43(1)	A retailer must ensure that a payment plan for a residential customer is fair and reasonable taking into account the information in subclause 43(1)(a) and (1)(b)	Priority: 1	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted Horizon Power offers customers experiencing payment difficulties or financial hardship, various payment arrangements. This includes customised payment plans (max 12 months) that accommodate particular customer circumstances.</p> <p>Payment arrangements are processed through Velocity, with a CSR placing a 28 day suspension of activity on the account to assist the customer.</p> <p>Once a payment arrangement has been processed on a customer account, a Payment arrangement letter is automatically issued via email, containing the details of the agreed upon arrangement. If the customer does not have an email address, it is issued via mail. If a payment arrangement has been altered, the system will issue another Payment arrangement letter containing the new details.</p> <p>On sample testing of ten customers enquiring about payment difficulties or financial hardship, the following was noted:</p> <ul style="list-style-type: none"> All customers were offered a payment arrangement in line with the Code of Conduct with the CSR taking into account the customers' ability to pay within a certain timeframe. All customers were issued a Payment Arrangement letter within the five business day timeframe. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
213A	Electricity Industry Act, section 82 Code of Conduct, clause 43(2)	A retailer must, in relation to a residential customer for whom a payment plan is being considered, offer the customer assistance to manage their bills for ongoing consumption during the period of the payment plan.	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with Retail Operations Manager, we were informed that the Computershare team provides suggestions on managing the consumption of electricity in accordance with the payment plan agreed upon with the Hardship customers.</p> <p>This compliance requirement applies to Horizon Power since Feb 2023 due to changes in Code of Conduct 2022 and Horizon Power does not have a documented call script to provide suggestions on managing the electricity consumption to Hardship Customers.</p> <p>Through interviews, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power has complied with the obligation for the period.</p>		
214	Electricity Industry Act, section 82 Code of Conduct, clause 43(5)	If a residential customer accepts a payment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 43(5) within 5 business days.	Priority: 1	Control Adequacy: B	Compliance Rating: 2
			<p>Through enquiries with the Retail Operations Manager, we noted Horizon Power will provide customers with confirmation of their payment arrangement within five business days. We noted once a payment arrangement plan has been set up through Velocity and agreed with the customer, the system automatically triggers a Payment Arrangement Confirmation letter to be generated and sent to the customer.</p> <p>Sample testing was conducted over five customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. <p>However, we also noted that the consequences of not complying with the payment plan was not documented in the payment arrangement letter shared with customers.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		
214A	Electricity Industry Act, section 82 Code of Conduct, clause 44(1)	A retailer must review a payment plan at the request of a residential customer.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where customer has requested to reassess the arrangement originally agreed. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
214B	Electricity Industry Act, section 82 Code of Conduct, clause 44(3)	The retailer must offer to vary a payment plan if a review under subclause 44(1) indicates that the customer is unable to meet obligations under the payment plan.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where customer has requested to reassess the arrangement originally agreed. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
214C	Electricity	The retailer must, within	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 82 Code of Conduct, clause 44(4)	5 business days after the customer accepts an offer to vary the payment plan, provide the customer with information that clearly explains, and assists the customer to understand, the variation.	<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where customer has requested to reassess the arrangement originally agreed. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
214D	Electricity Industry Act, section 82 Code of Conduct, clause 44(5)	The retailer must not vary a payment plan without the customer's agreement.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where customer has requested to reassess the arrangement originally agreed. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
214E	Electricity Industry Act, section 82 Code of Conduct, clause 44(6)	An agreement under subclause 44(5) must relate to the particular variation rather than under a general agreement to future variations.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted that Hardship customers are generally provided with 12 weeks of credit cycle after which the hardship flag can be reviewed considering the circumstances of a customer.</p> <p>We understand that this is a new compliance requirement from the Code of Conduct 2022, which is applicable from Feb 2023. Further we have been informed that there have been no such instances where customer has requested to reassess the arrangement originally agreed. Therefore, a control</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			assessment for this obligation was not performed and cannot be rated for compliance.		
215	Electricity Industry Act, section 82 Code of Conduct, clause 45(1)	A retailer must give reasonable consideration to a request by a customer experiencing financial hardship, or a relevant consumer representative for the customer, for a reduction of the customer's fees, charges or debt.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted the following is taken into consideration when reviewing the customer's request to reduce their fees charges or debts:</p> <ul style="list-style-type: none"> • The customer's willingness to receive energy efficiency information, and • If the customer can meet their payment obligations for three consecutive weekly/fortnightly payments by the due date on their hardship payment plan and are willing to or have sought financial counselling as and when required. <p>Each customer request will be individually assessed by the CSR and sent to the Retail Operations Manager for approval.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
216	Electricity Industry Act, section 82 Code of Conduct, clause 45(2)	In acting under subclause 45(1), a retailer must take into account its hardship policies and procedures under clause 46.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of the Hardship policy, we noted that Horizon Power has documented the following items in line with clause 45 and 46 of the Code of Conduct.</p> <ol style="list-style-type: none"> a. A statement encouraging customers to contact the retailer if they are experiencing problems paying their bill; b. A statement advising that the retailer will treat all customers sensitively and respectfully; c. An objective set of hardship indicators; d. An overview of the payment and other assistance available to customers; e. a statement that the retailer offers residential customers the right to pay their bill by Centrepay; f. A statement that the retailer is able to provide further details on request; g. An overview of any concessions that may be available to the retailer's customers; 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>h. Telephone number for interpreter services, identified by the National Interpreter Symbol;</p> <p>i. Telephone number (or numbers) for services that can assist customers with a speech or hearing impairment;</p> <p>j. A statement specifying how the retailer will treat information disclosed by the customer to the retailer and information held by the retailer in relation to the customer.</p> <p>2. guidance on–</p> <p>(I) about the suspension of disconnection and debt recovery procedures; and</p> <p>(II) about the reduction or waiver of fees, charges or debt; and</p> <p>(III) about the recovery of debt; and</p> <p>3. Through further discussions with the Retail Operations Manager, we noted that Horizon Power’s Financial Hardship Policy document was developed in consultation with relevant consumer representatives, namely the WACOSS (Western Australia Council of Social Services) and the FCAWA(Financial Counsellor Association Western Australia). Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015. We noted the ERA has not directed Horizon Power to review its hardship policy and hardship procedures and Horizon Power has not made a material amendment to its hardship policy during the audit period.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
217	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 6.7</p>	<p>If it is reasonably demonstrated to a retailer that a customer experiencing financial hardship is unable to meet the customer’s obligations under a payment arrangement, the retailer must give reasonable consideration</p>	<p>Priority: 3</p>	<p>Control Adequacy: A</p>	<p>Compliance Rating: 1</p>
			<p>Through interviews with the Retail Operations Manager, we noted if a customer experiencing financial hardship is unable to meet the financial obligations under a previously elected payment arrangement plan, Horizon Power gives reasonable consideration to offering the customer a revised payment arrangement plan.</p> <p>In the event this occurs, Horizon Power do not amend the existing payment arrangement plan, instead the previous plan is ceased and a new revised payment arrangement plan is created. When a customer informs Horizon Power, they are unable to meet the obligations of a payment arrangement, the arrangement will be cancelled. When a customer breaks the payment</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
		to offering the customer an instalment plan or revising an existing instalment plan.	<p>arrangement terms, Velocity will automatically end the arrangement and issue the customer a Broken Payment Arrangement Letter.</p> <p>On sample testing of five hardship customers, we noted that CSR instructs the customer to contact Horizon Power if the customer is having difficulty making payment and we noted when the customer had broken a payment arrangement or informed Horizon Power of inability to meet the financial obligations of the payment arrangement, the customer was subsequently offered a revised payment arrangement.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>					
218	Electricity Industry Act, section 82 Code of Conduct, clause 45(3)	A retailer must advise a customer experiencing financial hardship of the information specified in subclause 45(3).	<table border="1" data-bbox="779 667 1998 735"> <tr> <td data-bbox="779 667 1122 735">Priority: 2</td> <td data-bbox="1122 667 1464 735">Control Adequacy: B</td> <td data-bbox="1464 667 1998 735">Compliance Rating: 2</td> </tr> </table> <p>Through interviews with the Retail Operations Manager and review of the Financial Hardship Policy, we noted Horizon Power have following controls in place to ensure that customers who are assessed as experiencing financial hardship are advised of:</p> <ul data-bbox="831 879 1998 1098" style="list-style-type: none"> • The right to have a bill redirected at no charge; • Payment methods available; • Information on applicable tariffs; • Information on concessions (including HUGS) that may be available and how to access them; and • The availability of financial counselling services. <p>It was also noted that during the audit period, no financial hardship customers instructed Horizon Power to redirect a bill to a third person. Additionally, through examination of an example residential customer bill, reminder notice and disconnection warning, we noted all billing related documents include information on the payment methods available to customers.</p> <p>However, through our sample testing of memo logs (documented interaction with customer and Customer Service Representative) in Velocity and payment arrangement letters of Hardship and Payment difficulty customers, we observed that the following items were not documented</p>			Priority: 2	Control Adequacy: B	Compliance Rating: 2
Priority: 2	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>/communicated to the customers:</p> <ul style="list-style-type: none"> (a) customer’s right to have a bill redirected to a different address (including an email address) at no charge; (b) payment methods available to the customer; and (c) concessions that may be available to the customer and how to access them; and (d) different types of tariffs that may be available to the customer; (e) independent financial counselling services and relevant consumer representatives available to assist the customer; and (f) availability of any other financial assistance offered by the retailer, and how to access this assistance. <p>Based on interviews and review of documents, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
219	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 6.9(1)</p>	<p>A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representatives, as referred to in subclause 5.4(3).</p>	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not prescribe a minimum payment in advance amount for any residential customers experiencing financial hardship or payment difficulties.</p> <p>A CSR will agree for a payment plan which aligns with the customer’s consumption average. Horizon Power regularly receives calls from financial counsellors and will engage in a three-way conversation with residential customers experiencing payment difficulties or financial hardship. Horizon Power, in consultation with consumer representatives, will look at customer’s current debt levels and consumption usage over the past year to determine the most suitable payment plan.</p> <p>On review of five sample customers for Hardship and Payment difficulty, we noted that Horizon Power do not ask for the minimum advance amount.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
220	Electricity Industry Act, section 82 Code of Conduct, clause 46(1)	A retailer must develop, maintain and implement a hardship policy and hardship procedures to assist customers experiencing financial hardship to meet their financial obligations and responsibilities to the retailer.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Horizon Power Financial Hardship Policy document, we noted that Horizon Power maintains and implements aforementioned policy to assist customers who are experiencing financial hardship in meeting their responsibilities to Horizon Power. Both the Policy and Procedures were last amended and submitted to the Authority for review in 2015. Horizon Power's Hardship Policy has been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA. Additionally, Horizon Power has created a Hardship and HUGS Overview document to support the existing Policy.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
221	Electricity Industry Act, section 82 Code of Conduct, clause 46(2)	A retailer must ensure that its hardship policy complies with the criteria specified in subclause 46(2).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Hardship procedure, we noted that Horizon Power has documented the following items in line with Clause 46.</p> <ul style="list-style-type: none"> • A statement encouraging customers to contact the retailer if they are experiencing problems paying their bill; • A statement advising that Horizon Power will treat all customers sensitively and respectfully; • An objective set of hardship indicators; • An overview of the payment and other assistance available to customers; • a statement that Horizon Power offers residential customers the right to pay their bill by Centrepay; • A statement that Horizon Power is able to provide further details on request; • An overview of any concessions that may be available to customers; • Telephone number for interpreter services, identified by the National Interpreter Symbol; • Telephone number (or numbers) for services that can assist customers with a speech or hearing impairment; and • A statement specifying how Horizon Power will treat information disclosed by the customer. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
222	Electricity Industry Act, section 82 Code of Conduct, clause 46(3)	A retailer must ensure that its hardship procedures comply with the criteria specified in subclause 46(3).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>On review of Financial Hardship policy, we noted that following information is included in the policy to comply the requirements stated in clause 46(3) of code:</p> <ul style="list-style-type: none"> • The procedure provides training to Horizon Power and Computershare staff on issues relating to financial hardship, its impacts and how to deal sensitively and respectfully with customers experiencing financial hardship; • The procedure includes guidance and/or reference in relation to: <ul style="list-style-type: none"> - Identifying customers who are experiencing financial hardship; - Assessing the residential customer's electricity usage and capacity to pay when creating a payment arrangement plan; - Suspension of disconnection and debt recovery activities for customers experiencing financial hardship; - Debt waiving activities; and - Debt recovery activities • The procedure requires credit team staff have a direct telephone number and that number be provided to relevant consumer representatives <p>Therefore, Horizon Power has complied with this obligation.</p>		
223	Electricity Industry Act, section 82 Code of Conduct, clause 6.10(4)	If requested, a retailer must give residential customers and relevant consumer representatives a copy of the retailer's hardship policy, including by post,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Hardship Policy, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship.</p> <p>The Hardship Policy has been uploaded on the Horizon Power website and CSR customers have been</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		at no charge.	trained to direct customers to the website if they request the Hardship Policy. Therefore, Horizon Power has complied with this obligation.		
223A	Electricity Industry Act, section 82 Code of Conduct, clause 46(4)	Representatives whenever the retailer is developing a hardship policy or procedure or making material amendment to its hardship policy.	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we noted that Horizon Power's Financial Hardship policy document was developed in consultation with relevant consumer representatives, namely the WACOSS (Western Australian Council of Social Service) and the FCAWA (Financial Counsellors' Association of Western Australia). We further confirmed that there has not been any material change to the Hardship Policy during the review period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
223B	Electricity Industry Act, section 82 Code of Conduct, clause 46(5)	A retailer must provide a copy to the ERA of: <ul style="list-style-type: none"> its hardship policy, and a copy of the policy if the retailer makes a material amendment. 	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager and review of the Hardship Policy, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship. The Policy was last amended and submitted to the ERA for review in 2015. We noted the ERA has not directed Horizon Power to review its hardship policy and hardship procedures and Horizon Power has not made a material amendment to its hardship policy during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
225	Electricity Industry Act, section 82	If directed by the ERA, a retailer must review its hardship policy and	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager and review of relevant documentation, we noted that Horizon Power have developed a Financial Hardship Policy and Procedure to assist		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 46(6)	hardship procedures in consultation with relevant consumer representatives for the purposes of the review and submit the results of that review to the ERA within the period specified by the ERA.	<p>customers experiencing financial hardship. Both the Policy and Procedure were last amended and submitted to the ERA for review in 2015. We noted the ERA did not directed Horizon Power to review its hardship policy and hardship procedures during the audit period.</p> <p>Horizon Power's Hardship Policy and Procedures have been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
226	Electricity Industry Act, section 82 Code of Conduct, clause 6.10(7)	A retailer must comply with the ERA's Financial Hardship Policy Guidelines.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>On comparison of Hardship Policy Guidelines updated by ERA in August 2019 with Horizon Power financial hardship policy we noted that, the below mandatory statements are included as required:</p> <p>(a) Hardship policy has been developed in consultation with relevant consumer representatives namely the WACOSS and the FCAWA;</p> <p>(b) included a statement encouraging customers to contact their Horizon Power if a customer is having trouble paying the retailer's bill;</p> <p>(c) included a statement advising that the Horizon Power will treat all customers sensitively and respectfully;</p> <p>(d) included a statement that the Horizon Power may reduce and/or waive fees, charges and debt;</p> <p>(e) included an objective set of hardship indicators;</p> <p>(f) (i) an overview of the assistance available to customers in financial hardship or payment difficulties in accordance with the Code</p> <p>(ii) that the Horizon Power offers residential customers the right to pay their bill by Centrepay; and</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>(iii) a statement that the Horizon Power is able to provide further detail on request.</p> <p>(g) include an overview of any concessions that may be available to the retailer's customers;</p> <p>(h) include- (i) the National Interpreter Symbol with the words Interpreter Services;</p> <p>(ii) information on the availability of independent multi-lingual services; and</p> <p>(iii) information on the availability of TTY services;</p> <p>(i) be available on the retailer's website; and</p> <p>(j) be available in large print copies; and</p> <p>(k) include a statement specifying how the Horizon Power will treat information disclosed by the customer.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
227	Electricity Industry Act, section 82 Code of Conduct, clause 6.10(8)	If a retailer makes a material amendment to its hardship policy, the retailer must consult with relevant consumer representatives and submit a copy of the retailer's amended hardship policy to the ERA within 5 business days of the amendment.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager and review of the Hardship Policy, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship.</p> <p>Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015. We noted the ERA has not directed Horizon Power to review its hardship policy and hardship procedures and Horizon Power has not made a material amendment to its hardship policy during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
228	Electricity	A retailer must consider	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings					
	Industry Act, section 82 Code of Conduct, clause 47	any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	<p>Through interviews with the Retail Services Manager, we noted in the event a business customer experiences payment difficulties, Horizon Power will assist the business customer into entering an alternative payment arrangement plan.</p> <p>The option to offer a payment arrangement plan to a business customer is considered on case by case basis. The process to calculate and apply a payment arrangement plan is performed through Velocity via the same process that is used for residential customers.</p> <p>It was noted that Horizon Power offers business customers various alternative payment options, including extended payment arrangements and balloon payment arrangements. Business customers are not eligible to apply for a HUGS grant.</p> <p>Based on review of one sample for business customer experiencing payment difficulties, we noted Horizon Power had entered a business customer into an alternative payment arrangement plan.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>					
229	Electricity Industry Act, section 82 Code of Conduct, clause 48	Before arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a written notice (a reminder notice), which contains the information specified in subclause 48(1)(a), not less than 15 business days from the dispatch date of the bill. The retailer must	<table border="1" data-bbox="775 847 2011 922"> <tr> <td data-bbox="775 847 1122 922">Priority: 3</td> <td data-bbox="1122 847 1462 922">Control Adequacy: B</td> <td data-bbox="1462 847 2011 922">Compliance Rating: 2</td> </tr> </table> <p>Through interviews with the Retail Operations Manager and review of one sample of reminder and disconnection notice, we noted that Horizon Power has the following controls in place to ensure they use their best endeavours to contact the customer to advise them of the proposed disconnection in line with code of conduct 48 (1):</p> <ul data-bbox="775 1098 2011 1401" style="list-style-type: none"> • A reminder notice is sent to the customer 16 business days after the invoice is sent to the customer, where the amount due is greater than \$50. The reminder notice advises customer to contact Horizon Power should they be experiencing payment difficulties. Also, it provides contact details for complaints if a customer wishes to complaint. • A disconnection warning notice is sent five business days after the reminder notice, 21 business days after the invoice issue date. • The customer receives a phone call five days after the disconnection warning notice has been delivered, to inform the customer of their obligation to pay for the overdue account. 			Priority: 3	Control Adequacy: B	Compliance Rating: 2
Priority: 3	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings
		use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and timeframes specified in subclause 48(1)(c).	<ul style="list-style-type: none"> A disconnection warning card service order is raised 30 business days after the invoice issue date and takes approximately five business days to be processed. <p>We noted this process is an automated process with reminder notices and disconnection warnings issued according to the timeframes above which are pre- programmed into Velocity.</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20 Annual Compliance Report as as the standard disconnection notice template did not include a reference to the complaint handling process, contact number and option to access the Electricity Ombudsman. We further understand that 7889 customers were issued the disconnection warning letters during 2019-20 and the missing information was subsequently communicated in customer bills, reminder notices and complaint handling process.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power had generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period.</p>
230	Electricity Industry Act, section 82 Code of Conduct, clause 49(a)	A retailer must not arrange for a disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 49(a).	<p style="text-align: center;">Priority: 4</p> <p style="text-align: center;">Control Adequacy: A</p> <p style="text-align: center;">Compliance Rating: 1</p> <p>Through interviews with the Retail Operations Manager and review of one sample of reminder and disconnection notice, we noted the following controls to comply with sub clause 49(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> A disconnection warning card service order is raised 30 business days after the invoice issue date. A disconnection service orders take approximately five business days to be processed complying with requirement of non-disconnection within one day of expiry of the period referred in the disconnection warning. <p>We noted this process is an automated process with reminder notices and disconnection warnings issued according to the timeframes above which are pre- programmed into Velocity.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
232	Electricity Industry Act, section 82 Code of Conduct, clause 51(2)	If the conditions specified in subclause 51(1) are satisfied, a retailer may arrange for the disconnection of a customer's supply address for denying access to the meter.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services manager, we noted Horizon Power uses its best endeavours to not disconnect a customer for denying access to a meter in accordance with the prescribed circumstances.</p> <p>If a meter in customer's premises has not been read in 8 months, the regional metering team raises a Must-Read Service Order for the reads to be obtained to confirm that Horizon Power have taken 1 actual reading in a 12-month time frame. If a customer denies entry to the site, Horizon Power (local offices) requests the customer to send a photo of the meter in full to allow Horizon Power to issue an actual read based bill. All, AMI & plug-in type meters can be read remotely through mData21. For old meters, field technicians visit the premises every 10 months to obtain a meter reading.</p> <p>Further through interviews with the Retails operations Manager and review of the disconnection listing during the review period, it was observed that Horizon Power had not disconnected a customer for denying access to the meter during the review period.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
232A	Electricity Industry Act, section 82 Code of Conduct, clause 51(4)	A retailer may arrange for the disconnection of a customer's supply address if the customer has not provided the safe access to the customer's supply address for the purposes of testing, maintaining, inspecting, altering or	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Retail Operations Manager and review of disconnection listing during the review period, we noted that there have been no such instances wherein disconnection was performed on account not providing the safe access to the customer's supply address for the purposes of testing, maintaining, inspecting, altering or replacing a meter, or checking the accuracy of the customer's consumption at the supply address.</p> <p>Further through interviews with the Retails operations Manager and review of the disconnection listing during the review period, it was observed that Horizon Power had not disconnected a customer providing the safe access to the customer's supply address for the purposes of testing,</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		replacing a meter, or checking the accuracy of the customer's consumption at the supply address.	maintaining, inspecting, altering or replacing a meter, or checking the accuracy of the customer's consumption at the supply address. Therefore, Horizon Power has complied with this obligation.		
233	Electricity Industry Act, section 82 Code of Conduct, clause 7.5	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.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and review of Horizon Power website and customer bill, it was noted that Horizon Power has a 24-hour faults number available on the website and customer bill. Through contacting the faults line, customers can obtain information on the nature of the emergency and an estimate of the time when the supply of electricity will be restored as mentioned in clause 7.5 of the Code of Conduct. Therefore, Horizon Power has complied with this obligation.		
234	Electricity Industry Act, section 82 Code of Conduct, clause 52	Subject to subclause 52(3), a retailer or distributor must comply with the limitations specified in subclauses 52(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.	Priority: 1	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we noted that if a complaint is made to Horizon Power or the Ombudsman, a CSR will apply a temporary complaint suppression to the customer's Velocity account. Suppressing a customer's account will automatically halt any overdue notifications and stop an account from being disconnected. We further understand that noted this temporary suppression applied is for a period of 28 days, and Customer Service Representatives (CSR) add a manual calendar reminder prior to the 28 business days to check the status of the complaint and decide whether an extension of the suppression is needed. Once a complaint has been resolved, the CSR will close the complaint in Velocity, releasing the account from suppression.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>Sample testing of one customer complaint verified that customer accounts were correctly suppressed where a complaint was made directly related to the reason for a proposed disconnection to Horizon Power, Ombudsman or an external dispute resolution body complying with requirement of clause 52 of Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
235	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 7.7(1)</p>	<p>If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must comply with subclause 7.7(1).¹⁰</p>	<p>Priority: 2</p>	<p>Control Adequacy: A</p>	<p>Compliance Rating: 1</p>
			<p>Through interviews with the Retail Operations Manager and review of life support procedure documents, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request, usually via customer directly calling CSRs.</p> <p>A life support equipment form is then sent out to the customer to obtain confirmation from an appropriately qualified medical practitioner of the life support requirement via registered post. At the same time, the customer account is assigned a life support critical code which triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer after their move-in.</p> <p>The remote lockout prevents the meter from being de-energised in all circumstances. Additionally, prior to any disconnection service order being raised, a CSR will check the customer details ledger on Velocity to ensure that it is not for a life support customer and once this is approved, the credit team are then permitted to raise the disconnection service order.</p> <p>Based on review of disconnection listing with the life support customer list, we noted that none of the life support customer have been disconnected during the audit period complying with requirement of clause 7.7 (1) of the Code of Conduct.</p> <p>The Retail Operations Manager advised that if the process were initiated by a customer providing Horizon Power with confirmation from an appropriately qualified medical practitioner regarding the requirement of life support equipment, the receipt of this confirmation will be recorded against customer account on Velocity and the same registration procedures as detailed above would be</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>followed.</p> <p>Through sample testing of five customers, we noted that two instances of customer providing Horizon Power with confirmation from an appropriately qualified medical practitioner regarding the requirement of life support equipment. However, the life support requests have been processed within one day of request.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
236	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 7.7(2)</p>	<p>A retailer must undertake the actions specified in subclauses 7.7(2)(e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer:</p> <ul style="list-style-type: none"> • that the person requiring life support equipment is changing supply address; • that the customer, but not the person requiring life support equipment, is changing supply address; • of a change in contact details; or 	Priority: 2	Control Adequacy: B	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, and review of life support procedure documents, we noted Horizon Power records the required changes on the customer life support details on Velocity upon receiving the customer request. Any changes made to life support customer details will create a workflow on Velocity to be approved by the Retail Operations Manager.</p> <p>In addition, as Horizon Power is a vertically integrated utility, the requirement of Clause 7.7(2)(f) under the Code of Conduct requiring the retailer to notify the distributor would not be applicable to Horizon Power. Based on confirmation with the Retail Operations Manager, we noted that samples for amendment of life-support changes could not be identified.</p> <p>Through interviews, it was concluded that Horizon Power has generally adequate controls with improvement needed and compliance obligation was not rated for the period.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		<ul style="list-style-type: none"> that the address no longer requires registration as life support equipment address. 			
237	Electricity Industry Act, section 82 Code of Conduct, clause 7.7(3)	The distributor must comply with subclauses 7.7(3)(a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1)(c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).	Priority: 2	Control Adequacy: NP	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager and review of life support procedure documents, we noted Horizon Power records the customer life support registration and equipment type or any required changes to the customer life support details on Velocity upon receiving the customer request.</p> <p>Any changes made to life support customer details will create a workflow on Velocity to be approved by the Retail Operations Manager.</p> <p>As Horizon Power is a vertically integrated utility, the requirement of Clause 7.7(1)(c) and 7.7(3)(a) under the Code of Conduct 2018 requiring the distributor to act on the request of a retailer would not be applicable to Horizon Power, given there is currently no other retailer on its supply network.</p> <p>We also confirmed with the Retail Operations Manager that, during the audit period, Horizon Power had not received any instruction from a relevant government agency regarding the requirement to add or change life support customer details.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
238	Electricity Industry Act, section 82 Code of	If life support equipment is registered at a customers' supply address under subclause	Priority: 1	Control Adequacy: B	Compliance Rating: 4
			<p>Through interviews with the Retail Operations Manager and review of life support procedure documents, we noted Horizon Power records the customer life support registration and equipment</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings
	Conduct, clause 7.7(4)	7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b).	<p>type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity which triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer subsequent to their move-in. The remote lockout prevents the meter from being de-energised in all circumstances.</p> <p>Additionally, prior to any disconnection service order being raised, a CSR will check the customer details ledger on Velocity to ensure that it is not for a Life Support customer and once this is approved, the Credit Team are then permitted to raise the disconnection service order.</p> <p>Through review of the disconnection listing and life support customers listing, we noted that no life support customers had been disconnected during the audit period.</p> <p>For planned outages, a daily automated report for life support customers is sent from Velocity to the regional teams for review. If required, the regional teams will update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events.</p> <p>The updated localised report is distributed by CSR in the region via email to the regional staff and on-site crews. Where there are planned outages, a report is generated through by the Operations team by inputting the transformer number which will be affected by the outage. The system will then then provide all installation details that will be affected and, including any life support critical codes attached to the supply address.</p> <p>The CSR in the regions refer to this report and their localised report to contact each customer affected on the list, via phone calls or text message.</p> <p>At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer.</p> <p>All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>by the regions. The regional teams advised that if there were any planned outage to restore supply, the same notification processes would be followed.</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2020-21 and 2021-22 Annual Compliance Report as follows:</p> <ul style="list-style-type: none"> In 2020-2021, One Life Support Customer was disconnected for a planned power interruption. The customer was notified of the planned outage in writing, three days prior to the interruption, however acknowledgement of receipt (by verbal, written or electronic means) from the customer, or someone residing at the supply address, was not obtained by Horizon Power. In 2021-22, Two customers who had persons residing at those supply addresses who require life support equipment had their electricity interrupted during a planned power interruption. While Horizon Power notified each customer of the planned power interruption in writing in accordance with clause 7.7(4)(b) of the Code on 7 October 2021 (Relevant Notice), Horizon Power failed in complying with the Life Support Notice Requirement, as the Relevant Notice incorrectly indicated that the planned power interruption was to occur on 12 October 2021, when in fact, the planned power interruption was scheduled for 13 October 2021. <p>Based on interviews and review of documents, it was concluded that Horizon Power had improved the control environment significantly since the identification of non-compliant instances. Therefore, Horizon Power was non-compliant with the obligation during the audit period with ongoing improvements needed to the control environment.</p>		
238A	Electricity Industry Act, section 82 Code of Conduct, clause 7.7(4A)	A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager and review of Customer Experience Planned Power Outage Work Instructions, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity.</p> <p>A daily automated SQL (Structured Query Language) report for life support customer is sent from</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings								
		<p>registered as a life support equipment address.</p>	<p>Velocity to the regional teams for review. If required, the regional teams update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events.</p> <p>The updated localised report is distributed via email to the regional staffs and on-site crews. Where there are planned outages, a report is generated through by the Operations team by inputting the transformer number which will be affected by the outage. The system will then then provide all installation details that will be affected and, including any life support critical codes attached to the supply address. The regional teams refer to this report and their localised report to contact each customer affected on the list, via phone calls or text message.</p> <p>At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer. All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible by the regions. The regional teams advised that if there were any planned outage to restore supply, the same notification processes would be followed.</p> <p>Horizon Power is not aware of any instance where a life support equipment address had been affected by an interruption to restore supply.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>								
239	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 7.7(5)</p>	<p>If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply</p>	<table border="1"> <tr> <td data-bbox="772 1110 1120 1181">Priority: 3</td> <td data-bbox="1120 1110 1460 1181">Control Adequacy: N/P</td> <td data-bbox="1460 1110 2007 1181">Compliance Rating: N/R</td> </tr> <tr> <td colspan="3" data-bbox="772 1181 2007 1388"> <p>Through interviews with the Retail Operations Manager and review of Life support procedure documents, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity which triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer subsequent to their move-in. The remote lockout</p> </td> </tr> </table>			Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R	<p>Through interviews with the Retail Operations Manager and review of Life support procedure documents, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity which triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer subsequent to their move-in. The remote lockout</p>		
Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R									
<p>Through interviews with the Retail Operations Manager and review of Life support procedure documents, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity which triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer subsequent to their move-in. The remote lockout</p>											

Obligation no.	Obligation reference	Obligation description	Observation and findings
		<p>address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption.</p>	<p>prevents the meter from being de-energised in all circumstances.</p> <p>Additionally, prior to any disconnection service order being raised, a CSR will check the customer details ledger on Velocity to ensure that it is not for a Life Support customer and once this is approved, the Credit Team are then permitted to raise the disconnection service order.</p> <p>Through review of the disconnection listing and life support customers listing, we noted that no life support customers had been disconnected during the audit period.</p> <p>For planned outages, a daily automated report for life support customers is sent from Velocity to the regional teams for review. If required, the regional teams will update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events as per the Emergency Procedure - Severe Storm, Cyclone, Flood and Bushfire Response.</p> <p>The updated localised report is distributed in the region via email to the regional staff and on-site crews. Where there are planned outages, a report is generated through by the Operations team by inputting the transformer number which will be affected by the outage. The system will then then provide all installation details that will be affected and, including any life support critical codes attached to the supply address.</p> <p>The Regional teams refer to this report and their localised report to contact each customer affected on the list, via phone calls or text message.</p> <p>At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer. All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible by the regions.</p> <p>As confirmed by the Retail Operations Manager, there were no such instances where Horizon Power has already provided notice of a planned interruption that affected a supply address, prior to the distributor registering a new customer in the same customer's supply address.</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
240	Electricity Industry Act, section 82 Code of Conduct, clause 7.7(6)	A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).	Priority: 3	Control Adequacy: B	Compliance Rating: 2
			<p>Through interviews with the Retail Operations Manager and review of life support procedures, we noted that the regional team for each region is responsible to request re-certification of the life support equipment. As per the procedure document, the regional team will receive a system reminder to send out the renewal form based on the memo added to the customer account upon move-in. The checks should usually commence 3 months prior to due dates to ensure enough time is provided for customer to turnaround responses.</p> <p>Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual Compliance Report as follows as Horizon Power has not requested annual confirmation, three (3) year re-certification or removed life support customers from the life support register during the reporting period.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power had generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
241	Electricity Industry Act, section 82 Code of Conduct, clause 7.7(7)	A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of life support procedures, we noted that each region is responsible to request re-certification of the life support equipment.</p> <p>Through interviews with the Retail Operations Manager and review of life support procedures, we noted that the regional team performs the deregistration process in the following two instances:</p> <ol style="list-style-type: none"> 1. When customer vacates life support supply address; and 2. When customer provides notice that they no longer require life support 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>Through one sample review of the deregistration process, we noted that Horizon Power has adequately performed deregistration based on customer's vacate notice.</p> <p>Also, as noted in compliance obligation #240, Horizon Power did not request annual confirmation or re-certification of life support and hence, there were no instances of life support removal for this scenario.</p> <p>Therefore, while Horizon Power has self-reported this obligation as non-compliant, it was concluded that Horizon Power has complied with this obligation.</p>		
242	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 53(2)</p>	<p>A retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection or decided to the satisfaction of the retailer, makes a request for reconnection and pays the retailer's reasonable charges (if any) for reconnection, or enters into a payment plan for the charges.</p>	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and Metering Services Manager and review of five sample cases of reconnections, we noted Horizon Power has following controls in place to comply with clause 53 (2) of the Code of Conduct:</p> <ul style="list-style-type: none"> • If a customer is disconnected due to non-payment, and subsequently requests a reconnection and provides proof of payment that any outstanding balance has been paid or agrees to a payment plan or is assessed as experiencing payment difficulties or financial hardship, Horizon Power will reconnect the supply address. • If a customer is disconnected for non-application, Horizon Power will reconnect the customer when an account is established with Horizon Power and the occupant of the supply address becomes a customer of Horizon Power. <p>When a customer contacts Horizon Power and requests a reconnection after a disconnection due to non-payment, CSRs seeks that the customer provides Proof of Payment, or enters into a payment plan. Once proof of payment (whether in full or as an instalment of a payment plan) is received, the CSR raises a re- energisation service order which is processed overnight via the AMI meters.</p> <p>Through testing, we noted that Horizon Power reconnected a customer's supply address within timeframes stipulated after the customer remedied their breach.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
244	Electricity Industry Act, section 82 Code of Conduct, clause 54(1)	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 54(4), if the circumstances specified in subclause 54 (1) apply.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and Metering Services Manager and review of five sample cases of reconnections, we noted Horizon Power has following controls in place to comply with clause 54 (1) of the Code of Conduct:</p> <ul style="list-style-type: none"> • If a customer is disconnected due to non-payment, and subsequently requests a reconnection and provides proof of payment that any outstanding balance has been paid or agrees to a payment plan or is assessed as experiencing payment difficulties or financial hardship, Horizon Power will reconnect the supply address. • If a customer is disconnected for non-application, Horizon Power will reconnect the customer when an account is established with Horizon Power and the occupant of the supply address becomes a customer of Horizon Power. <p>When a customer contacts Horizon Power and requests a reconnection after a disconnection due to non-payment, CSRs seeks that the customer provides Proof of Payment, or enters into a payment plan. Once proof of payment (whether in full or as an instalment of a payment plan) is received, the CSR raises a re-energisation service order which is processed overnight via the AMI meters.</p> <p>Through testing, we noted that Horizon Power reconnected a customer's supply address within timeframes stipulated after the customer remedied their breach.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
245	Electricity Industry Act, section 82 Code of Conduct,	A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power licence area is an area in which a distributor may operate a pre-payment meter and a retailer may offer a pre-payment meter service as declared by the Minister by notice published in the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 9.1(2)	by the Minister by notice published in the Government Gazette.	Government Gazette. Therefore, Horizon Power has complied with this obligation.		
246	Electricity Industry Act, section 82 Code of Conduct, clause 56(1)	A retailer must not provide a pre-payment meter service at a residential customer's supply address without the verifiable consent of the customer or the customer's nominated representative.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and review call recording for a move-in of a pre-payment customer, we noted that customers can request a pre-payment meter when moving in, or for their current meter to be converted to a pre-payment meter, by contacting Horizon Power. We also noted that a verbal, verifiable consent from the customer to create a pre-payment account is sought over the phone. Therefore, Horizon Power has complied with this obligation.		
247	Electricity Industry Act, section 82 Code of Conduct, clause 56(2)	A retailer must establish an account for each pre-payment meter operating at a residential customer's supply address.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place to confirm that an account is established for each pre-payment meter operating at a supply address. Horizon Power's move-in-wizard is built into Velocity when creating accounts as a mandatory process, to confirm all customers details are confirmed, and verifiable consent received. A new account must be created in Velocity when the move in wizard is prompted. Review of Horizon Power's move-in-wizard within Velocity noted that a new account is created when a customer calls and requests a new pre-payment meter to be established. Through review of one sample move-in for a pre-payment customer, we noted that a new account is created at the time of move-in. Therefore, Horizon Power has complied with this obligation.		
249	Electricity	If a residential customer	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 82 Code of Conduct, clause 57(1)	requests information on the use of a pre-payment meter, a retailer must advise the information specified in subclause 57(1) at no charge, and in clear, simple and concise language.	<p>Through interviews with the Retail Operations Manager, we noted that pre-payment meter information specified in subclause 57(1) is provided to customer at the time of move-in. Also, relevant information is also available on Horizon Power website. We further noted when a customer requests information as mentioned in subclause 57 (1), Horizon Power will endeavour to provide at the requested information at no charge. Also, pre-payment information is mailed out on the day when a customer establishes their account.</p> <p>Inspection of the pre-payment meter information pack mailed out to customers noted that it provides information relating to customer charter, code of conduct and standard form of contract in clear, simple and concise language.</p> <p>Further we were informed that there were no such prepayment meter customers who requested information as mentioned in subclause 57(1) from Horizon Power during the review period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
250	Electricity Industry Act, section 82 Code of Conduct, clause 57(2)	No later than 10 business days after a residential customer enters into a pre-payment meter contract at that customer's supply address, a retailer must give, or make available to, that customer the information specified in subclauses 57(1) and	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, the following information as required under the code of conduct is made available in the Horizon Power website, customer charter and customer bills:</p> <ul style="list-style-type: none"> • all applicable tariffs, fees and charges payable by the customer and the basis for the calculation of those charges; • how the customer may recharge the pre-payment meter (including details of cost, location and business hours of recharge facilities); • the emergency credit facilities applicable to the pre-payment meter; and how credit may be retrieved; • a telephone number for enquiries; 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		57(2)(a)-(s) at no charge.	<ul style="list-style-type: none"> • a telephone number for complaints; and • the distributor's 24-hour telephone number for faults and emergencies; • details of any concessions the customer may be eligible to receive; and the amount of any concessions to be given to the customer; • the telephone number for interpreter services, identified by the National Interpreter Symbol; • the telephone number (or numbers) for services that can assist customers with a speech or hearing impairment; • a statement setting out how the retailer may assist in the event the customer is experiencing difficulties paying for their consumption; • a statement setting out how to make an enquiry of, or complaint; • the contact details for the electricity industry ombudsman; • general information on the safe use of electricity; • details of the initial recharge facilities available to the customer; and <p>Also, we noted that CSR team provides any information to the pre-payment customers if requested. Therefore, Horizon Power has complied with this obligation.</p>		
251	Electricity Industry Act, section 82 Code of Conduct, clause 57(3)	A retailer must ensure that the following information is shown on, or directly adjacent to, a residential customer's pre-payment meter: <ul style="list-style-type: none"> • the positive or negative balance of the pre-payment meter within one 	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>From interviews with the Retail Operations Manager, we were informed that Horizon Power's pre-payment meters are the same as their standard AMI meters, and have all prescribed information shown directly adjacent to the meter as below:</p> <ul style="list-style-type: none"> (a) the positive or negative balance of the pre-payment meter within \$1 of the actual balance; (b) whether the pre-payment meter is operating on normal credit or emergency credit (c) a telephone number for enquiries; (d) the distributor's 24-hour telephone number for faults and emergencies. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		dollar (\$1) of the actual balance; <ul style="list-style-type: none"> • whether the pre-payment meter is operating on normal credit or emergency credit; • a telephone number for enquiries; • the distributor's 24-hour telephone number for faults and emergencies. 	Therefore, Horizon Power has complied with this obligation.		
252	Electricity Industry Act, section 82 Code of Conduct, clause 57(4)	On request and at no charge, a retailer must give a pre-payment meter customer the following information: total energy consumption; average daily consumption; and the average daily cost of consumption for the previous 2 years, or for the period since the commencement of the pre-payment meter contract (whichever is	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that when any customer including a pre-payment customer requests information on energy consumption, Horizon Power CSRs aim to provide the customer with a complete breakdown of their usage for free, including their average daily consumption, or average daily cost.</p> <p>Horizon Power pre-payment customers also have the ability to access their personal energy consumption data and usage breakdown on the Horizon Power App at any time and for no charge.</p> <p>Through further discussions with the Retail Operations Manager, it was noted that Horizon Power did not receive any requests to provide a total usage breakdown during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		shorter), divided into quarterly segments.			
253	Electricity Industry Act, section 82 Code of Conduct, clause 57(5)	If the recharge facilities available to a residential customer change from the initial recharge facilities referred to in subclause 57(2)(q), a retailer must use reasonable endeavours to notify a pre-payment meter customer in writing within 10 business days after the change.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, it was noted that Horizon Power has controls in place to ensure customers are notified in the prescribed timeframe should there be any changes to the recharge facilities offered in their area. A listing of all current recharge facilities is available on company website.</p> <p>Is there are any changes occurring to an active recharge facility, Horizon Power will mail, or text affected customers within ten business days of being made aware of the change.</p> <p>Through further discussions with the Retail Operations Manager, we noted during the audit period, Horizon Power included the ability to recharge pre-payment meter services via the Horizon Power App and there no change in the recharge facilities.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
254	Electricity Industry Act, section 82 Code of Conduct, clause 9.4(1)	If a pre-payment meter customer notifies a retailer that it wants to replace or switch a pre-payment meter to a standard meter, the retailer must <ul style="list-style-type: none"> send the information referred to in clauses 2.3 and 2.4 to the 	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted Horizon Power's AMI meters have the ability to switch between pre-payment functionality and a standard functionality. Once a customer switches or replaces a pre-payment meter to a standard meter, a new account is created on Velocity, and the system automates an instruction to post out a welcome letter. The Horizon Power Welcome Letter is a standard letter that outlines that particular in clause 9.4(1)(a) regardless of the tariff applicable to the customer. Through discussion we were informed that there have not been any instances where pre-payment customer has requested to switch to a standard meter.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		<p>customer; and</p> <ul style="list-style-type: none"> • arrange with the relevant distributor to remove or render non-operational the pre-payment meter and replace or switch the pre-payment meter to a standard meter within 1 business day of the request. 	compliance.		
254A	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 58(1)</p>	<p>If a pre-payment meter customer requests the retailer to replace the pre-payment meter with a standard meter, the retailer must within 1 business day after the request arrange with the distributor to replace the pre-payment meter with a standard meter or switch the pre-payment meter to a standard meter.</p>	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted Horizon Power's AML meters have the ability to switch between pre-payment functionality and a standard functionality. Once a customer switches or replaces a pre-payment meter to a standard meter, a new account is created on Velocity, and the system automates an instruction to post out a welcome letter. Through discussion we were informed that there have not been any instances where pre-payment customer has requested to switch to a standard meter.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
255	Electricity Industry Act, section 82 Code of Conduct, clause 58(2)	A retailer must not charge a fee for reversion to a standard meter if a pre-payment meter customer is a residential customer and the customer makes a request under subclause 58(1) within 3 months after the day the pre-payment meter is installed or the date the customer entered into the pre-payment contract, whichever is later.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not charge any fees to customers for switching from a pre-payment meter to a standard meter (or vice versa), as AMI meters are used for both instances and switching can be done remotely without the need to attend the customers meter in person.</p> <p>On review of the Electricity tariffs and charges brochure available on the website, we noted that there are no fees charged for switching from a pre-payment meter to a standard meter.</p> <p>Through discussion we were informed that there have not been any instances where a pre-payment customer has requested to switch to a standard meter.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
255A	Electricity Industry Act, section 82 Code of Conduct, clause 58(4)	If the pre-payment meter customer is a residential customer, the retailer's obligations under 58(1) are not conditional on the customer paying the retailer's fee for reversion to a standard meter or otherwise, maybe made conditional on the pre-payment meter customer paying	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power does not charge any fees to customers for switching from a pre-payment meter to a standard meter (or vice versa), as AMI meters are used for both instances and switching can be done remotely without the need to attend the customers meter in person.</p> <p>On review of the Electricity tariffs and charges brochure on the website, we noted that there are no fees charged for switching from a pre-payment meter to a standard meter.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		the retailer's fee for reversion to a standard meter (if any).			
257	Electricity Industry Act, section 82 Code of Conduct, clause 59(1)	If a pre-payment meter customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the supply address requires life support equipment, the retailer must not provide a pre-payment meter service in that address; or, if applicable, comply with the prescribed requirements in subclauses 59(1)(a)-(c).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of listing for prepayment meter customers and life support customers, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request.</p> <p>The customer is then directed to complete a Life Support Equipment Registration Form to obtain confirmation from an appropriately qualified medical practitioner of the life support requirement.</p> <p>Also, the customer account is assigned a life support critical code and restricted to use of a standard meter and remotely converts a pre-payment meter at the address to a standard meter if applicable, at no cost to the customer. This also triggers a remote lockout function to be applied on the meter at move-in or when notified by the customer after their move-in. The remote lockout prevents the meter from being de-energised in all circumstances.</p> <p>Further based on review of listing for life support and prepayment customer list, we noted that no life support customers have been assigned a prepayment meter.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
259	Electricity Industry Act, section 82 Code of Conduct, clause 9.6	A retailer must ensure that a pre-payment meter service complies with the prescribed requirements in subclause 9.6.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and, we noted Horizon Power has controls in place to confirm that pre-payment meter services comply with the following particulars outlined in clause 9.6 of code of Conduct:</p> <ul style="list-style-type: none"> Horizon Power's AML meters are programmed to have \$20 emergency credit outside normal 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>business hours;</p> <ul style="list-style-type: none"> Through the use of AMI meters, Horizon Power can accurately monitor energy data usage as AMI meters upload usage data to mData21 at six hourly intervals: and AMI meters are capable of providing connection and disconnection data to mData21, as well as reconnecting supply once payment to the account in Velocity has been received. <p>Therefore, Horizon Power has complied with this obligation.</p>		
259 A	Electricity Industry Act, section 82 Code of Conduct, clause 60(1)	A retailer must ensure that a pre-payment meter customer has access to an amount of emergency credit of \$20 outside of normal business hours.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of system screenshot of emergency credit for prepayment meters, it was noted that pre-payment meter customers can access \$30 of emergency credit if required.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
259 B	Electricity Industry Act, section 82 Code of Conduct, clause 60(3)	If a pre-payment meter has been de-energised and the customer makes a payment to their account that results in an amount of credit in excess of emergency credit, the retailer must re-energise the meter.	Priority: 3	Control Adequacy: B	Compliance Rating: 3
			<p>Through interviews with the Retail Operations Manager, we were informed that following controls are available in the existing SGCIS (Smart Grid Customer Information System):</p> <ul style="list-style-type: none"> Customers can recharge from any of the recharge operations quoting the prepayment meter number. Once the recharge is completed, the recharge amount flows into the SGCIS system. The recharge amount is first set off against the emergency credit of customer. If the customer has recharged more than the emergency credit, that will show as a credit balance of customers. The prepayment meters are automatically re-energises as soon as prepayment meter credit balance is positive. <p>This compliance obligation was self-reported as non-compliant to the ERA in February 2023. It was</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>reported that 15 customers had extended duration of power outage due to a technical issue with the pre-payment metering system SGCIS (Smart Grid Customer Information). SGCIS did not recognise the payments made by the 15 customers to their accounts and hence, did not re-energise the meters. This was primarily due to an expired security certificate.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>		
259 C	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 60(5)</p>	<p>A retailer must ensure that a pre-payment meter service is capable of providing, at least once every month, the number of instances in which a pre-payment meter customer has been disconnected, the duration of each of those disconnections and, subject to subclause 60(3) and (4) recommences supply as soon as the information is communicated to the pre-payment meter that a payment to the account has been made.</p>	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of downtime report for prepayment meters, system is able to provide report on number of times connection has been disconnected and duration of disconnection. Further we understand that connection is automatically established by the system as soon as the payment is being made by customers.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
260	Electricity Industry Act, section 82 Code of Conduct, clause 61(a), (b) and (d)	<p>A retailer must ensure that:</p> <ul style="list-style-type: none"> at least 1 physical recharge facility is located as close as practicable to a pre-payment meter; and a pre-payment meter customer can access a recharge facility at least 3 hours per day, 5 days a week; and the minimum amount to be credited by a recharge facility does not exceed \$20 per increment. 	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power only offer pre-payment meter, on request. Horizon Power has controls in place to confirm that there is a recharge operator either in the community itself or at a supermarket or post office located nearby to the pre-payment community in accordance with the requirement of the Code.</p> <p>The minimum recharge amount of \$10 has been built into the prepayment SGCIS system thus not exceeding \$20 per increment. In addition, Horizon Power also makes available, recharge facilities via the Horizon Power App. On review of the recharge operator contact list and operating hours, we noted that there is at least 1 recharge facility located for each remote aboriginal community with operating hours in line with the requirement of the Code.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
261	Electricity Industry Act, section 82 Code of Conduct, clause 62	<p>If a pre-payment meter customer demonstrates to a retailer that the customer is entitled to receive a concession, the retailer must ensure that the customer receives the concession.</p>	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that Horizon Power has controls in place to comply with clause 62 of the Code of Conduct:</p> <ul style="list-style-type: none"> If a customer demonstrates that they are entitled to a concession, it is automatically applied to the customer's account. During the account establishment process, the Pre-payment Metering Administrator is prompted to request a CRN (Centrelink Reference Number) and enter concession details as part of the move-in-wizard during account set up. Rebates are issued after a meter reading route has been read and the read data has been 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>posted back to Velocity.</p> <ul style="list-style-type: none"> • Velocity then issues an invoice and once the invoice has been issued, the funds are transferred into SGCIS the next morning. • Review of one sample customer entering a pre- payment metering contract, it was noted that Horizon Power notes customers CRN at the time an account is established, and concession is credited to the prepayment account. <p>Therefore, Horizon Power has complied with this obligation.</p>		
262	Electricity Industry Act, section 82 Code of Conduct, clause 63(1)	If requested by a pre-payment meter customer, a retailer must make immediate arrangements to check the metering data; test the pre-payment meter; and/or arrange for a test of the metering installation at the connection point.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, it was noted that Horizon Power has controls in place to support the testing of a pre-payment meter when requested by a customer. On review of the 'C3.1.1 - METER TESTING PROCESS.pdf', the meter testing process map, revealed a detailed workflow including responsibilities for all teams involved in a meter test such as the Metering Team, the Meter Test Lab, and Regional Depot. The Process map shows the steps followed by the CSR and all subsequent teams when a customer requests a meter read, regardless of if they are on a post or pre-payment contract. Through further discussion with the Retail Operations Manager, we noted that during the audit period, there were no customer requests for a pre-payment meter test.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
263	Electricity Industry Act, section 82 Code of Conduct,	If requested by a retailer, a distributor must check or test a pre-payment meter.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Horizon Power is both a retailer and a distributor in the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 63(2)				
264	Electricity Industry Act, section 82 Code of Conduct, clause 63(4)	If a pre-payment meter is found to be inaccurate or not operating correctly, a retailer must: immediately arrange for the repair or replacement of the pre-payment meter; correct any overcharging or undercharging; and refund any charges payable by a customer for testing the pre-payment meter.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through review of the meter testing process, we noted that if the meter test is requested by customer/ metering/ regional team and the meter test fails then a customer bill is credited on accuracy difference and meter test fee.</p> <p>We also noted that there were no customer requests for pre-payment meter testing during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
265	Electricity Industry Act, section 82 Code of Conduct, clause 64	Subject to a pre-payment meter customer notifies a retailer of the proposed vacation date, the retailer must ensure that the customer can retrieve all remaining credit at the time the customer vacates the supply address.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that when a customer notifies Horizon Power of their proposed vacation/move out date, Horizon Power will confirm the customer can retrieve all and any remaining credit to their pre-payment account. Horizon Power AMI meters can be disconnected by Horizon Power representatives on the date the customer advises they will be vacating the supply address. The AMI meters will provide a usage data read and finalise the account within Velocity. When a Horizon Power representative is advised of the proposed vacation, if there is any credit remaining on the account, they will raise a refund within Velocity and coordinate a refund either via cheque or EFT(Electronic Fund Transfer).</p> <p>On review of one sample Pre-payment meter finalisation report, we noted that when the pre-</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>payment customer advised they were vacating the supply address, the credit remaining on the account was refunded by Horizon Power in accordance with the customers instructions.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
266	Electricity Industry Act, section 82 Code of Conduct, clause 65(1)	If a pre-payment meter customer (including a customer who has vacated the supply address) has been overcharged as a result of an act or omission of a retailer or distributor, the retailer must use its best endeavours to inform and reimburse the pre-payment meter customer, in the timeframe and manner specified in 65(1).	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, it was noted that pre-payment customers can only be overcharged if a meter fails in the network operator's favour, and that this did not occur during the audit period. Review of the Meter Test Process Map outlines that should a meter fail, a test usage will be calculated on accuracy difference. If an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account within the specified timeframe.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
267	Electricity Industry Act, section 82 Code of Conduct, clause 65(2)	The retailer must credit or pay the amount in accordance with the pre-payment meter customer's instructions within 12 business days of receiving the instructions.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, it was noted that customers can only be overcharged if a meter fails in the network operator's favour, and that this did not occur during the audit period. Review of the Meter Test Process Map outlines that should a meter fail, a test usage will be calculated on accuracy difference. If an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account within the specified timeframe.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Through further discussion with the Retail Operations Manager, we noted that there were no such instances where instructions were received for credit to their bank account. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
268	Electricity Industry Act, section 82 Code of Conduct, clause 65(3)	If a retailer does not receive reimbursement instructions within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's account.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, it was noted that if an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account within the specified timeframe. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
269	Electricity Industry Act, section 82 Code of Conduct, clause 65(6)	If a retailer proposes to recover an amount undercharged to a pre-payment meter customer as a result of an act or omission by the retailer or distributor, the retailer must comply with the conditions specified in subclause 65(6).	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we noted that Horizon Power did not attempt to recover an undercharged amount from a pre or post payment customer during the audit period. If a customer vacates a premises in emergency credit, Horizon Power will write off this amount. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
270	Electricity Industry Act,	A retailer must give reasonable consideration to a request by a	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we were informed that Horizon Power had		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 82 Code of Conduct, clause 9.11(1)	residential customer or relevant consumer representative for a waiver of any fee to replace or switch a pre-payment meter to a standard meter.	not charged a fee to replace or switch a pre-payment meter to a standard meter during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
271	Electricity Industry Act, section 82 Code of Conduct, clause 66(2)	If a retailer is informed by a pre-payment meter customer that the customer is experiencing difficulties paying for their consumption, or the retailer identifies the customer as having been disconnected in the manner specified in subclause 66(1)(b), the retailer must, subject to subclause 66(4), as soon as reasonably practicable to provide the information prescribed in subclause 66(2)(a) to (e) to the customer.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted that if Horizon Power identifies or is informed of a pre-payment customer facing financial hardship, then the standard financial hardship procedures would apply, however the customer would not be eligible for the Hardship Utilities Grant Scheme.</p> <p>Review of relevant Financial Hardship documentation noted that Horizon Power has controls in place to refer customers experiencing payment difficulties or financial hardship to the appropriate financial assistance programs, consumer representatives and counselling services, as well as offering information about different types of meters available to them. We confirmed with the Retail Operations Manager that a pre-payment meter customer had not informed Horizon Power of financial hardship or payment difficulties during the audit period. Additionally, Horizon Power had not identified any customers as being disconnected in the manner specified in 9.11(2) (b) during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
271A	Electricity Industry Act, section 82 Code of Conduct, clause 66(3)	On request the retailer must provide the information referred to in subclause 66(2) to the customer in writing.	Priority: 3	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that if requested by customer, a CSR directs the customer to the Horizon Power website where the relevant information is available. If additionally requested, the information about the following will be shared over e-mail in line with clause 66(3).</p> <p>Also, the following information is available on the website:</p> <ul style="list-style-type: none"> • information about any concessions that may be available to the customer and how to access them; • information about relevant financial assistance programs; • information about how to contact relevant consumer representatives; • information about independent financial and other relevant counselling services. <p>However, we noted that there is no documented work instructions/call script to provide such information.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
271B	Electricity Industry Act, section 82 Code of Conduct, clause 66(5)	The retailer must give reasonable consideration to a request by the customer, or relevant consumer representative for the customer, for a reduction of the customer's fees, charges or debt.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that there have not been any cases where prepayment customers have been set up under the payment difficulty or Hardship Program. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
271C	Electricity Industry Act, section 82 Code of Conduct, clause 67(2)	The retailer must not charge a fee to replace the pre-payment meter with a standard meter where the circumstances prescribed in subclause 67(1) apply.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>During interviews with the Retail Operations Manager in relation to charges for revision to a standard meter from a pre-payment meter, we noted Horizon Power does not charge any fees to customers for switching from a pre-payment meter to a standard meter (or vice versa), as AMI meters are used for both instances and switching can be done remotely without the need to attend the customers meter in person.</p> <p>On review of the Electricity tariffs and charges brochure, we noted that there are no fees charged for switching from a pre-payment meter to a standard meter.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
271D	Electricity Industry Act, section 82 Code of Conduct, clause 68(1)	The retailer must publish on its website the information detailed in subclause 68(1).	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>On review of the Horizon Power website, customer charter and hardship policy, we noted that following information is available in line with the clause 68(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> the type of concessions available to customers; cost-effective and efficient ways to utilise electricity; the typical running costs of major domestic electrical appliances; the retailer's hardship policy; and the retailer's family violence policy; and a summary of a customer's rights, entitlements and obligations under the retailer's standard complaints and dispute resolution procedures; the contact details for the electricity industry ombudsman and a copy of this code <p>Therefore, Horizon Power has complied with this obligation.</p>		
271E	Electricity	If a customer requests	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Act, section 82 Code of Conduct, clause 68(3)	information of the kind referred to subclause 68(1) the retailer must refer the customer to the retailer's website or provide the information to the customer without charge.	Through interviews with the Retail Operations Manager, it was noted that Horizon Power CSRs will provide the information referred to in subclause 68(1) or refer the customer to where to find such information on the website, at no charge. Based on further discussions with the Retail Operations Manager, it was concluded that Horizon Power had not received any requests to provide the information prescribed in the subclause during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
271F	Electricity Industry Act, section 82 Code of Conduct, clause 68(4)	If a customer requests a copy of information of the kind referred to in subclause 68(1), the retailer must provide a copy of the information to the customer without charge.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			On review of a welcome letter provided to the customer at the time of move-in, we noted that below information is available in Horizon power website and same can be provided to customer on a free of cost: <ul style="list-style-type: none"> Type of concessions available Cost-effective and efficient ways to utilise electricity Hardship policy Family violence policy a summary of a customer's rights, entitlements and obligations under the retailer's standard complaints and dispute resolution procedures the contact details for the electricity industry ombudsman and Copy of the code We also noted that a CSR will provide all information as above if requested by the customer. Therefore, Horizon Power has complied with this obligation.		
272	Electricity Industry Act,	A retailer must give notice of any variations in its tariffs, fees and	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and one sample customer bill before and		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 82 Code of Conduct, clause 10.1(1)	charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.	after the tariff changes, we noted that, that customers affected by any variations in tariffs are informed of the changes no later than the next bill within the customer's billing cycle. Therefore, Horizon Power has complied with this obligation.		
273	Electricity Industry Act, section 82 Code of Conduct, clause 69	On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees or charges, including any alternative tariffs that may be available to that customer.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			On review of Horizon Power scripts, we noted upon request, CSRs are trained to provide customers information on Horizon Power's tariffs and fees. Customers were informed all the fees and charges and information can be found on Horizon power website, or a CSR can read for customer on request. Further, a Welcome letter shared with customer specifies the details regarding fees & charges are available in Horizon power website and available at free of cost. On review of the 'Electricity Fee and charges' section of Horizon Power's website and Electricity tariffs and charges brochure (w.e.f. 1 July 2022) noted that it includes information on Horizon Power's tariffs, fees and charges. Therefore, Horizon Power has complied with this obligation.		
273A	Electricity Industry Act, section 82 Code of Conduct, clause 70(1), (2) and (3)	If a customer's tariffs, fees or charges are regulated or set by the State Government, a retailer must give notice to a customer of any variation to its tariffs, fees or charges, that affects the customer no later than the next bill in	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and one sample customer bill before and after the tariff changes, we noted that, that customers affected by any variations in tariffs are informed of the changes no later than the next bill within the customer's billing cycle. On review of one sample bill with a tariff variation message, we noted that Horizon Power gives notice of a variation in tariffs, fees and charges immediately on next bill. Therefore, Horizon Power has complied with this obligation.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		the customer's billing cycle.			
274	Electricity Industry Act, section 82 Code of Conduct, clause 10.1(3)	A retailer must give or make available to a customer the information requested on tariffs, fees and charges within 8 business days of the date of receipt and, if requested, provide the information in writing.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that CSRs provide customers information on Horizon Power's tariffs and fees. Customers are informed all the fees and charges information can be found on Horizon power website, or the Computershare team can read for customer on request. Also, CSRs aim to provide information over the phone immediately.</p> <p>Where a customer requests tariffs, fees or charges information in writing, CSRs will email or mail the required information whilst speaking with the customer on the phone. Mail requests are processed overnight, and therefore complying with the 8-business day requirement under the Code of Conduct</p> <p>On review of the 'Electricity fee and charges' section of Horizon Power's website and Electricity tariffs and charges brochure (w.e.f. 1 July 2022) noted that it includes information on Horizon Power's tariffs, fees and charges.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
275	Electricity Industry Act, section 82 Code of Conduct, clause 72(1)	On request, a retailer must provide a non-contestable customer with their billing data.	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample request for providing billing data, we were informed that upon request, Horizon Power provides customers, free of charge, all available billing data over the phone, through email or by post.</p> <p>Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Operations Manager also confirmed that in no circumstances Horizon Power charges a customer for providing billing data.</p> <p>CSRs aim to provide the requested information immediately over the phone. If the customer</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>requests consumption data in writing the CSRs trigger an email to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct.</p> <p>If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data.</p> <p>However, we noted that, Horizon Power does not have a documented work instructions/call script to provide billing data to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
276	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 72(2)</p>	<p>If a non-contestable customer requests billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with a retailer, the retailer must provide the data at no charge.</p>	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of one sample request for providing billing data, we were informed that upon request, Horizon Power provides customers, free of charge, all available billing data over the phone, through email or by post.</p> <p>Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Operations Manager also confirmed that in no circumstances Horizon Power charges a customer for providing billing data.</p> <p>CSRs aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSRs trigger an email to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct.</p> <p>If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data.</p> <p>However, we noted that, Horizon Power does not have a documented work instructions/call script to</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>provide billing data to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
277	Electricity Industry Act, section 82 Code of Conduct, clause 10.2(3)	A retailer must give the requested billing data under subclause 10.2(1) within 10 business days of the receipt of the request, or on payment of the retailer's reasonable charge for providing this data.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post, regardless of the requested timeframe. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Operations Manager confirmed that in no circumstances would Horizon Power charge a customer for the provision of billing data.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
278	Electricity Industry Act, section 82 Code of Conduct, clause 10.2(4)	A retailer must keep a non-contestable customer's billing data for 7 years.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post, regardless of the requested timeframe. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. All information in Velocity is backed up and indefinitely maintained on the system, with protocol being to never destroy any information/data stored in Velocity and therefore complying with the 7 years requirement of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
279	Electricity Industry Act, section 82 Code of Conduct, clause 10.3	On request and at no charge, a retailer must provide a residential customer with information on the types of concessions available to the residential customer and the name and contact details of the organisation responsible for administering those concessions (if not the retailer).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Horizon Power website, we noted concession details are provided to customers by the following methods:</p> <ul style="list-style-type: none"> • As part of the move-in process, customers who establish an account are sent an acknowledgement email and a welcome letter in the mail. • In both the acknowledgement email and welcome letter, customers are referred to the Customer charter under billing concessions, which includes general concession information and informs customers on where further information on concessions can be obtained. • The Horizon Power website and Financial Hardship policy provides customers with information on concession and rebates. On review of Horizon Power website, we have noted that customers are eligible for concessions and rebates provided if they hold at least one below concessions cards: <ul style="list-style-type: none"> - Centrelink Health Care Card - Centrelink Pensioner Concession Card - Veterans Affairs Gold Card - Veterans Pensioner Concession Card <p>If a customer requests concession information to be provided in writing, CSRs are trained to provide this information in writing via email at no charge.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
280	Electricity Industry Act, section 82 Code of Conduct, clause 73	At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and one sample communication to customer, we noted Horizon Power controls in place to provide customers with written details on the obligation to make service standard payments along with mandatory annual tariff and fees charges update at least once a year complying with clause 73 of the Code of Conduct.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.	<p>Further, we also noted that Horizon Power provides services standard payment information on the website under the 'Make a claim' section and in the Customer Charter. Customers can find all relevant service standards payment information under the 'Make a Claim' tab, as well directions on how to make a relevant claim.</p> <p>Through review of the Customer charter and website, we noted that information on Horizon Power's obligation to make payments to customers is outlined as required, including the amount of the payment and any eligibility criteria.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
281	Electricity Industry Act, section 82 Code of Conduct, clause 10.4	On request and at no charge, a retailer must give, or make available to, a customer general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Horizon Power website, it was noted that if a customer asks a CSR (via phone, email etc) for information or advice around cost effective and efficient ways of utilising electricity and typical running costs of domestic appliances, the CSR endeavours to provide this at no cost, as well as direct the customer to the 'Energy Saving Tips' page on the website. CSRs provide customers tailored advice for being more energy efficient over the phone as well as promoting the use of Horizon Power App that allows customers to track their energy usage complying with requirement of clause 10.4 of the Electricity Industry Act.</p> <p>Review of Horizon Power's website noted that the 'Energy Saving Tips' section provides information on cost effective and efficient ways to utilise electricity as well as typical running costs of major domestic appliances.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
282	Electricity Industry Act, section 82 Code of	If asked by a customer for information relating to the distribution of electricity, a retailer	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that upon request, CSRs are trained to provide general distribution information including:</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Conduct, clause 74	must give the information to the customer or refer the customer to the distributor for a response.	<ul style="list-style-type: none"> Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; An explanation for any unplanned interruptions to electricity supply; Advice on protecting metering equipment; Advice on the customer's electricity usage so that it does not interfere with the operation of a distribution system or with supply to any other electrical installation; General information on safe use of electricity General information on quality of supply; and General information on reliability of supply. <p>We were further informed that depending on the information being requested, the CSR aims to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website. However, we noted that there are no documented call script/work instructions that guide CSR to provide relevant information to customer.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
283	Electricity Industry Act, section 82 Code of Conduct, clause 10.6	On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6.	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that CSRs are trained to provide general distribution including information required in clause 10.6 of the Code of Conduct, this includes:</p> <ul style="list-style-type: none"> Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> • An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; • An explanation for any unplanned interruptions to electricity supply; • Advice on protecting metering equipment; • Advice on the customer's electricity usage so that it does not interfere with the operation of a distribution system or with supply to any other electrical installation; • General information on safe use of electricity • General information on quality of supply; and • General information on reliability of supply. <p>Further we noted that depending on the information being requested, the CSR aims to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website. However, we noted that there are no documented call script/work instructions that guide CSR to provide relevant information to customer.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
283A	Electricity Industry Act, section 82 Code of Conduct, clause 75(1)	A distributor must publish on its website the information detailed in subclause 75(1)(a) to (k).	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through review of Customer Charter and information available on Horizon Power Website, we noted that following information is available in line with Clause 75(1) of the Code of Conduct:</p> <ul style="list-style-type: none"> • a description of the distributors and customer's respective rights and obligations concerning the provision of services by the distributor and a description of those services; and • details of applicable connection and reconnection timeframes; and • details of applicable connection and reconnection charges; and • information relating to new connections or connection alterations; and • general information on the safe use of electricity; and • general information on quality of supply; and • a summary of a customer's rights, entitlements and obligations under the distributor's standard 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>complaints and dispute resolution procedures; and</p> <ul style="list-style-type: none"> • general information on reliability of supply; and • the contact details for the electricity industry ombudsman; and • a copy of this code <p>However, we noted that following information is not explicitly available on Horizon Power website:</p> <ul style="list-style-type: none"> • information about how a customer may obtain information on distribution standards and metering arrangements that are relevant to the customer and – <ul style="list-style-type: none"> - prescribed under the Act or the Electricity Act 1945; or - adopted by the distributor <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
283B	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 75(3)</p>	<p>If a customer requests information of the kind referred to subclause 75(1) the distributor must refer the customer to the distributor's website or provide the information to the customer without charge.</p>	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that CSRs are trained to provide general distribution including information required in clause 75(1) of the Code, this includes:</p> <ul style="list-style-type: none"> • Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; • An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; • An explanation for any unplanned interruptions to electricity supply; • Advice on protecting metering equipment; • Advice on the customer's electricity usage so that it does not interfere with the operation of a 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> • distribution system or with supply to any other electrical installation; • General information on safe use of electricity • General information on quality of supply; and • General information on reliability of supply. <p>Further we noted that depending on the information being requested, the CSR aims to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website. However, we noted that there are no documented call scripts/ work instructions available for guiding CSRs for providing such general information to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
283C	Electricity Industry Act, section 82 Code of Conduct, clause 75(4)	If a customer requests a copy of information of the kind referred to in subclause 75(1), the distributor must provide a copy of the information to the customer without charge.	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that CSRs are trained to provide general distribution including information required in clause 75(1) of the Code, this includes:</p> <ul style="list-style-type: none"> • Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; • An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; • An explanation for any unplanned interruptions to electricity supply; • Advice on protecting metering equipment; • Advice on the customer's electricity usage so that it does not interfere with the operation of a distribution system or with supply to any other electrical installation; • General information on safe use of electricity 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> • General information on quality of supply; and • General information on reliability of supply. <p>Further we noted that depending on the information being requested, the CSR aims to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website. Further the copy of the information can be provided to customers if requested to CSRs. However, we noted that there are no documented call scripts/ work instructions available for guiding CSRs for providing such general information to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
283D	Electricity Industry Act, section 82 Code of Conduct, clause 76	A distributor must give to a customer on request, at no charge an explanation for any unplanned or approved change in the quality of supply of electricity to the customer's supply address outside of the limits prescribed by law, and an explanation for any unplanned interruption of supply of electricity to the customer's supply address.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted that CSRs are trained to provide an explanation for any unplanned or approved change in the quality of supply of electricity to the customer's supply address outside of the limits prescribed by law, and an explanation for any unplanned interruption of supply of electricity to the customer's supply address in line with clause 76 of the Code of Conduct.</p> <p>We were further informed that there have been no such instances where customer has requested information on unplanned outages or change in quality of supply of electricity.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
284	Electricity Industry Act, section 82 Code of Conduct, clause 10.7(1)	On request, a distributor must provide a customer with their consumption data.	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that when any customer requests information on energy consumption, Horizon Power CSRs aim to provide the customer with a complete breakdown of their usage immediately and for free, including their average daily consumption, or average daily cost; this breakdown can be provided for any timeframe since the creation of the Horizon Power account in Velocity.</p> <p>Horizon Power customers also have the ability to access their personal energy consumption data and usage breakdown on the Horizon Power App at any time and for no charge. If a customer requests in information in writing, the CSR can trigger the email to the customer immediately while on the phone which will include the whole breakdown.</p> <p>Through review of one sample request of customer, it was observed that Horizon Power provides customer with their consumption data as requested complying with requirement of clause 10.7(1). However, we noted that there are no documented work instructions available to provide consumption details to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
285	Electricity Industry Act, section 82 Code of Conduct, clause 10.7(2)	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2)(a)-(b).	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power provides customers, free of charge, all available consumption data over the phone, through email or by post, regardless of the requested timeframe. Consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account.</p> <p>CSRs aims to provide the requested information immediately over the phone including consumption data for a period less than the previous two years as well as consumption data in relation to a</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>dispute with Horizon Power. If the customer requests consumption data in writing, CSR shares consumption details over an email.</p> <p>Through review of one sample request of customer, it was observed that Horizon Power provides customer with their consumption data as requested complying with requirement of clause 10.7(1). If the customer has a Horizon Power 'MyAccount', CSRs direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. However, we noted that there are no documented work instructions available to provide consumption details to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
286	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 10.7(3)</p>	<p>A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of:</p> <ul style="list-style-type: none"> the request; or payment of the distributor's reasonable charge for providing the consumption data (if payment is required and requested by the distributor within 2 business days of the 	Priority: 4	Control Adequacy: B	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted upon request, Horizon Power provides customers, free of charge, all available consumption data over the phone, through email or by post, regardless of the requested timeframe.</p> <p>Consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account. CSRs aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer complying requirement of Code of Conduct, clause 10.7(3).</p> <p>Through review of one sample request of customer, it was observed that Horizon Power provides customer with their consumption data as requested complying with requirement of clause 10.7(3). If the customer has a Horizon Power 'MyAccount', CSRs direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. However, we noted that there are no documented work instructions available to provide consumption details to customers.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		request).	<p>If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. Additionally, training is provided to CSRs which cover consumption information. However, we noted that there are no documented work instructions available to provide consumption details to customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was compliant with the obligation.</p>		
287	Electricity Industry Act, section 82 Code of Conduct, clause 10.7(4)	A distributor must keep a customer's consumption data for 7 years.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing and consumption data over the phone, through email or by post, regardless of the requested timeframe.</p> <p>Billing and consumption data is stored within Velocity and customers are able to obtain all available billing and consumption data from the date the customer created their account. All information in Velocity is backed up and indefinitely maintained on the system, with protocol being to never destroy any information/data stored in Velocity and therefore complying with the 7 years requirement of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
288	Electricity Industry Act, section 82 Code of Conduct, clause 10.8(1)	On request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted upon request, a customer will be informed that information on distribution standards and metering arrangements can be obtained from the Horizon Power website. On review of the website, we noted the following:</p> <ul style="list-style-type: none"> Details are provided on Horizon Power's electricity supply obligations and voltage frequency and tolerance limits for electricity supply; 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		that are relevant to the customer or adopted by the distributor.	<ul style="list-style-type: none"> Horizon Power’s general metering requirements with the purpose to provide the electrical consulting and electrical contracting industry information on metering and connecting a customer are outlined; and Reference is made to the approved mandatory link criteria and the Horizon Power Metrology Procedure, both of which are approved by the ERA. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
290	Electricity Industry Act, section 82 Code of Conduct, clause 77	To the extent practicable, a retailer or distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format that is easy to understand.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted that any new or amended letters, bills, and publicly available documents are reviewed by the Retail Operations Manager and Legal Team prior to publication, to ensure they are expressed in clear, simple, and concise language and format.</p> <p>On review of the Customer charter, customer bills and terms and conditions (both standard and non-standard), and particulars of contract noted they are presented in simple English and are easy to understand.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
291	Electricity Industry Act, section 82 Code of Conduct, clause 10.10(1)	On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that a copy of the Code is appropriately provided to customers upon request and at no charge.</p> <p>Once a customer has agreed to enter into an agreement with Horizon Power and the CSR has logged the new connection within Velocity, the system will automatically trigger a Welcome letter to be sent to the customer. This letter states that a copy of the Code of Conduct can be obtained on the Horizon Power website.</p> <p>If a customer requests information on where to obtain a copy of the Code a CSR will direct them to the Horizon Power website.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
292	Electricity Industry Act, section 82 Code of Conduct, clause 10.10(2)	A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that a copy of the Code is appropriately provided to customers upon request and at no charge.</p> <p>Once a customer has agreed to enter into an agreement with Horizon Power and the CSR has logged the new connection within Velocity, the system will automatically trigger a Welcome letter to be sent to the customer. This letter states that a copy of the Code of Conduct can be obtained on the Horizon Power website.</p> <p>If a customer requests information on where to obtain a copy of the Code a CSR will direct them to the Horizon Power website.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
294	Electricity Industry Act,	On request and at no charge, a retailer and a	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Horizon Power Disability Access Plan for the 2019-2024, we noted that, Horizon</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	section 82 Code of Conduct, clause 78(1)	distributor must make services available to a residential customer to assist the customer in understanding information provided by the retailer or distributor (including independent interpreter services for customers with speech or hearing impairment, and large print copies).	<p>Power CSR provides customers with interpreter and translator services. This service is provided through a dedicated TTY (Teletypewriter) number which is provided on customer bills.</p> <p>On further review of the Horizon Power Customer charter, customer bill, reminder notice and disconnection warning, we noted that Horizon Power includes TTY and Interpreter services national number and symbol which is accessible for customers with special information needs.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
295	Electricity Industry Act, section 82 Code of Conduct, clause 78(2)	For residential customers, a retailer and, if appropriate, a distributor, must include the information prescribed in subclause 78(2)(a) and (b) on its bills and bill-related information, reminder notices and disconnection warnings.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of the Horizon Power Customer charter, customer bill, reminder notice and disconnection warning, noted that Horizon Power includes TTY and Interpreter services national number and symbol that is accessible for customers with special information needs.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
296	Electricity Industry Act, section 82	On request and at no charge, a distributor must advise a customer of the availability of	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Metering Services Manager, it was noted that only one type of meter (AMI type meters) available, the standard cost associated with installation, operation and maintenance</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 79(1)	different types of meters, as well as their suitability for the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.	are available on the website for customer's reference. Also, CSRs will aim to provide information requested by customers over the phone and may also direct customer enquiries to the Metering team. Therefore, Horizon Power has complied with this obligation.		
297	Electricity Industry Act, section 82 Code of Conduct, clause 79(2)	On request, a retailer must advise a customer of the availability of different types of meters or refer the customer to the distributor for a response.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with Metering Services Manager, it was noted that only one type of meter available, and the details are available on the website for customer's reference. Also, CSRs will aim to provide information requested by customers over the phone and may also direct customer enquiries to the Metering team. Therefore, Horizon Power has complied with this obligation.		
297A	Electricity Industry Act, section 82 Code of Conduct, clause 80	A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24-hour emergency line, as prescribed under subclause 80(a) and use its best endeavours to restore supply as soon	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and a review of the customer bill and Horizon Power website, we noted that Horizon Power has a 24-hour faults number available on the website and customer bill. Customers can contact the faults line to obtain information on the nature of the emergency and an estimate of when the electricity supply will be restored, as mentioned in Subclause 80(a). Therefore, Horizon Power has complied with this obligation.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		as possible			
297 B	Electricity Industry Act, section 82 Code of Conduct, clause 82(2)	If a customer provides the retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must, in accordance with the relevant standard, register the customer's supply address as a life support equipment address, register a person's contact details, as prescribed under subclause 82(6) in relation to the supply address and provide that information to the distributor.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that Horizon Power registers a customer's address/account as a life support address immediately on their request in advance of receiving the completed life support registration form which includes a sign-off confirmation from a qualified medical practitioner.</p> <p>On review of one sample request of life support registration, we noted that all customers contact details are recorded against their address, including life support customers. As Horizon Power is both a distributor and a retailer and hence has access to the life support customer contact details.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
297C	Electricity	A retailer must provide	Priority: 3	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings					
	Industry Act, section 82 Code of Conduct, clause 82(3)	the information detailed under subclause 82(3) to the customer within 5 days after registering the customer's supply address as a life support equipment address.	Through interviews with the Retails Operations Manager and one sample communication with the customer we noted that following information is provided in line with the clause 82 (3) of the Code of Conduct: <ul style="list-style-type: none"> • advice that there may be planned or unplanned interruptions to the supply of electricity to the supply address and that the distributor is required to provide a notification of a planned interruption in accordance with this code; • a recommendation that the customer prepare a plan of action in case of an unplanned interruption; • an emergency telephone contact number of Horizon Power Therefore, Horizon Power has complied with this obligation.					
297D	Electricity Industry Act, section 82 Code of Conduct, clause 82(5)	If a customer, for a supply address registered under subclause 82(2), notifies the retailer that the person residing at the customer's supply address who requires life support equipment is changing supply address, or that the customer is changing supply address but not the person who requires life support equipment, or that there has been a change in contact details, then the	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: yellow; text-align: center;">Priority: 2</td> <td style="text-align: center;">Control Adequacy: N/P</td> <td style="text-align: center;">Compliance Rating: N/R</td> </tr> </table> <p>Through interviews with the Retail Operations Manager, it was noted that life support customer changing address would follow the standard move-in/move-out process with the addition of their life support status registration being transferred to the new address with their account. We noted that there have not been such cases where life support customer address was changed and requested to Horizon Power in line with clause 82(2) of the Code of Conduct.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>			Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		retailer must, in accordance with the relevant standard a. register the change and b. provide a notification to the distributor of the change.			
297F	Electricity Industry Act, section 82 Code of Conduct, clause 84(1)	A distributor must not undertake a planned interruption of the supply of electricity to a life support equipment address unless the distributor has met the conditions prescribed under subclause 84(1).	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retails Operations Manager, it was noted that registered life support customers are sent notifications via email or letter (depending on their preference) of planned outages that will impact them at least 3 days in advance of the outage.</p> <p>It was also noted that the regional officers for the customers are notified via a memo on the customer's account of the requirement to ensure the customer is informed of the planned outage as early as possible. Review of one sample notification to a life support customer showed that the customer received a phone call to notify them, and on the phone call they had said they also received a text message to notify them.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
297G	Electricity Industry Act, section 82 Code of Conduct,	If subclause 84(2) applies, the distributor must use its best endeavours to contact the customer, or someone residing at the	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retails Operations Manager, it was noted that registered life support customers are sent notifications via email or letter (depending on their preference) of planned outages that will impact them at least 3 days in advance of the outage. It was also noted that the regional officers for the customers are notified via a memo on the customer's account of the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 84(3)	supply address, before the interruption occurs.	<p>requirement to ensure the customer is informed of the planned outage as early as possible.</p> <p>Review of one sample notification to a life support customer showed that the customer received a phone call to notify them, and on the phone call they had said they also received a text message to notify them.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
297I	Electricity Industry Act, section 82 Code of Conduct, clause 85(2)	A retailer must allow a customer at least 3 months to respond to the notice requesting confirmation of the information held in relation to the life-support equipment scheme and warn the customer of supply address de-registration from the life-support equipment scheme and details of resulting de-registration as prescribed under subclause 85(2).	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that there were no notices issued to the life support customers for disconnection for not providing confirmation on life support details. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
297J	Electricity Industry Act, section 82	If a retailer is notified that a customer's supply address no longer requires registration as a	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of life support procedures and one sample of deregistration for life-support noted that Horizon Power has controls that life support</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 86(2)	life support equipment address, the retailer must de-register the address as prescribed in subclause 86(2).	customers could be de-registered as life support customers in the instances listed under clause 86. On review of one sample of de registration, we noted that, deregistration was adequately performed based on the customer request and communicated to the customer. Therefore, Horizon Power has complied with this obligation.		
297K	Electricity Industry Act, section 82 Code of Conduct, clause 86(3) and (4)	If a customer fails to comply with a notice from the retailer under clause 85, in relation to a life support equipment address, within the period allowed under clause 85(2)(a), then the retailer must undertake action prescribed in subclauses 86(3) and 86(4).	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we were informed that there were no notices issued to the life support customers for disconnection for not providing confirmation on life support details. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
297L	Electricity Industry Act, section 82 Code of Conduct, clause 86(6)	A retailer must, when it de-registers a life support equipment address, provide the customer's distributor with a notification about the de-registration as detailed under subclause 86(6)	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			Horizon Power is both a retailer and a distributor and hence a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
297M	Electricity Industry Act, section 82 Code of Conduct, clause 86(7)	A distributor must de-register a life support equipment address in accordance with the relevant standard for a distributor.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, we were informed that there has not been any specific standard that need to be complied for deregistration of the life support customers. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
297N	Electricity Industry Act, section 82 Code of Conduct, clause 86(8)	Despite subclauses 86(1) to (7), a supply address must not be de-registered if the retailer is aware that another person residing at the supply address still requires life support equipment.	Priority: 3	Control Adequacy: N/P	Compliance Rating: N/R
			From our interviews with the Retail Operations Manager, it was noted that there were no instances where Horizon Power is aware that another person residing at the supply address still requires life support equipment. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
298	Electricity Industry Act, section 82 Code of Conduct, clause 87(1)	Each retailer and distributor must develop, maintain and implement a standard complaint and dispute resolution procedure.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Retail Operations Manager and a review of the following documents, we noted that Horizon Power controls in place to comply with requirement of clause 87(1) of the Code of Conduct as follows: <ul style="list-style-type: none"> Process customer complaint document: Horizon power has developed the Process customer complaint document to assist Horizon Power employees in logging and processing customer complaints. Complaints overview document: Horizon Power has developed the Complaints overview document to provide an overview of what a complaint is and the complaint escalation process with timeframes to acknowledge and resolve customer complaints. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
			<ul style="list-style-type: none"> Energy Ombudsman guidelines: Horizon Power has developed the Energy ombudsman guidelines to assist staff with the steps required to escalate a complaint to the Energy Ombudsman. <p>The customer complaints are handled by a CSR and makes a reasonable attempt to resolve the complaints. Complaints can be escalated to a Team Leader if it required. This process is documented in the 'Escalation Process' section of the Complaints overview document. If required, a complaint is referred to or sent directly to the Energy Ombudsman.</p> <ul style="list-style-type: none"> All customer complaints are logged into Velocity. A weekly report of all outstanding complaints is extracted from Velocity and sent to Computershare employees by the CSR; The Retail Operations Manager is responsible for maintaining and amending any internal processes in relation to handling customer complaints. <p>Therefore, Horizon Power has complied with this obligation.</p>					
299	Electricity Industry Act, section 82 Code of Conduct, clause 87(2)	The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).	<table border="1" data-bbox="775 831 2007 903"> <tr> <td data-bbox="775 831 1122 903">Priority: 4</td> <td data-bbox="1122 831 1462 903">Control Adequacy: B</td> <td data-bbox="1462 831 2007 903">Compliance Rating: 2</td> </tr> </table> <p>Through a review of the Process customer complaint document, we noted that Horizon power has included the following in line with the clause 87(2) of Code of Conduct:</p> <ul style="list-style-type: none"> how complaints must be lodged by customers; and how complaints will be handled by the retailer or distributor <p>Also, through review of the Customer overview document, we noted that following items have been documented in line with the clause 87(2) of Code of Conduct:</p> <ul style="list-style-type: none"> a right of a customer to have a complaint considered by a senior employee if the customer is not satisfied with the manner in which the complaint is being handled; and the information that will be provided to a customer, including in accordance with the requirements under clause 89; and (c) response times for complaints. 			Priority: 4	Control Adequacy: B	Compliance Rating: 2
Priority: 4	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings					
			<p>Further, Information on Horizon Power’s complaints handling process is available to all customers at no charge on the ‘Feedback and complaints’ section of the Horizon Power website as well as the Customer Charter which is also available on the website.</p> <p>However, we noted that the Process customer complaint and the Complaints overview does not include the process of response as per the clause 87(2)(d) of Code of Conduct.</p> <p>Based on review of customer complaint documents as mentioned above, it was concluded that Horizon Power had generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period.</p>					
299A	Electricity Industry Act, section 82 Code of Conduct, clause 87(3)	The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014.	<table border="1" data-bbox="775 667 2007 735"> <tr> <td data-bbox="775 667 1122 735">Priority: 4</td> <td data-bbox="1122 667 1462 735">Control Adequacy: B</td> <td data-bbox="1462 667 2007 735">Compliance Rating: 2</td> </tr> </table> <p>Through review of the Process customer complaint document, we noted that Horizon Power had developed the Process customer complaint document in line with AS/NZS in line with 10002:2006 and had not been updated as per AS/NZS 10002:2014 in line with clause 87 (3) of the Code of Conduct.</p> <p>Through further review of the Process customer complaint document, we noted that following items have not been included:</p> <ul data-bbox="775 1018 2007 1230" style="list-style-type: none"> • Commitment towards appropriate privacy statement; • Roles and responsibilities of Horizon Power’s key stakeholders; • Definition of continuous improvement and internal reporting practices, including root cause analysis and trend monitoring; • Information to be provided to the complainants; and • Training <p>Based on review of customer complaint documents as mentioned above, it was concluded that Horizon Power had generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period.</p>			Priority: 4	Control Adequacy: B	Compliance Rating: 2
Priority: 4	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
300	Electricity Industry Act, section 82 Code of Conduct, clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Complaints overview document, we noted when responding to a complaint, Horizon Power advises the customer that the complaint can be assessed by a senior employee. Also, if a customer request reasons for the decision made in writing, Horizon Power does so via mail or email.</p> <p>Further on review of the Customer charter, we noted that if the customer is not satisfied with how the complaint has been resolved internally, Horizon Power advises the customer of the reasons for the outcome and that the complaint can be referred to the Energy Ombudsman.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
301	Electricity Industry Act, section 82 Code of Conduct, clause 88	On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted written complaints can be received in the form of mail/fax, email or via an online feedback form. Customers who lodge a complaint by email or via an online feedback form are provided with an immediate automated acknowledgement. It is protocol for CSRs to acknowledge and respond to complaints received by mail/fax immediately upon receiving the complaint.</p> <p>All customer complaints are logged into Velocity and a weekly report of all outstanding complaints is extracted by the Retail Operations Manager and sent to Computershare employees to review.</p> <p>Through review of the Computershare Service Level Agreement with Horizon Power and one sample review of complaints received, we noted that customer complaints are acknowledged within three business days and responded within 15 business days and therefore complying with the requirement of clause 88 of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
301A	Electricity Industry Act, section 82 Code of Conduct, clause 89	A retailer or distributor must inform the customer of the outcome of a complaints process and, unless the customer has advised the retailer or distributor that the complaint has been resolved in a manner acceptable to the customer, information as detailed in 89(b)(i) to (iii).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Process customer complaint document, if a complaint could not be resolved in a manner acceptable to the customer, the following details are provided to the customer complying with requirement of clause 89 (b) of the Code of Conduct:</p> <ul style="list-style-type: none"> • reasons regarding the outcome; and • the customer may make a complaint or take a dispute to the electricity industry ombudsman; and • contact details for the electricity industry ombudsman. <p>Therefore, Horizon Power has complied with this obligation.</p>		
302	Electricity Industry Act, section 82 Code of Conduct, clause 12.2	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, review of the Complaints overview document which is provided to the Customer Service and Community team, we noted that the difference between queries and complaints is documented and included the definition of a 'complaint' which is in line with as set out per the ERA guidelines. We were further informed that CSRs distinguish between customer complaint and queries while responding calls of customers.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power had adequate controls with no improvement needed and Horizon Power was compliant with the obligation during the audit period.</p>		
303	Electricity Industry Act, section 82	On request and at no charge, a retailer, distributor and	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power directs customers who are seeking information that will assist them in utilising the complaints handling process to the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 12.3	electricity marketing agent must give a customer information that will assist the customer to utilise the respective complaints handling processes.	<p>Horizon Power website or the Customer Charter complying the requirement of clause 12.3 of the Code of Conduct.</p> <p>Through review of Customer Charter and website, we noted that it provides information regarding Horizon Power's complaints handling processes. The Horizon Power website and the Customer charter are available to all customers at no charge.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
304	Electricity Industry Act, section 82 Code of Conduct, clause 90	If a retailer, distributor or electricity marketing agent receives a complaint from a customer that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be appropriate to deal with the complaint (if known).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Retail Operations Manager, we noted that CSRs are aware that if a complaint that does not relate to Horizon Power, they must advise to the customer of the entity to deal with the complaint (if known) complying with the requirement of clause 90 of the Code of Conduct. It was informed to us that there have been no such instances where customer complained to Horizon Power which was not related to them.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
305	Electricity Industry Act, section 82 Code of Conduct, 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.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and a review of Annual Performance Reports for the year 2019/20, 2020/21 and 2021/22, we noted that Horizon Power prepares information as directed by the ERA within the timeframes specified.</p> <p>This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates. We noted that Horizon Power had prepared the relevant regulatory reports</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>during the audit period using the templates and information provided by the ERA complying with requirement of 13.1 of the Code of Conduct. These have been published on Horizon Power’s public website.</p> <p>This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates. We noted that Horizon Power had prepared the relevant regulatory reports during the audit period using the templates and information provided by the ERA complying with requirement of clause 13.1 of the Code of Conduct. These have been published on Horizon Power’s public website.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
306	Electricity Industry Act, section 82 Code of Conduct, clause 13.2	The report specified in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of Annual Performance Reports, we noted that Horizon Power has controls in place to prepare information as directed by the ERA within the timeframes specified. This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates.</p> <p>Through review of Annual Performance Reports, we noted that Horizon Power submitted the 2019/20, 2020/21 and 2021/22 Annual Performance Reports for its retail licences within the timeframes specified by the ERA. Horizon Power was provided with a template of the reporting sheets to complete the report, fulfilling the obligation requirement of providing the report in the manner and form as specified by the ERA complying with the requirement of clause 13.2 of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
307	Electricity Industry Act, section 82	The report specified in clause 13.1 must be published by the date	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that all the reports</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 13.3	<p>specified by the ERA. In accordance with clause 13.3(2), a report is published if:</p> <ul style="list-style-type: none"> copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and a copy is posted on the retailer or distributor's website. 	<p>requested by the ERA are published in line with the timeline provided. Once the reports have been submitted and approved by the ERA, Horizon Power will receive directions to publish them on their website, available at no cost to customers.</p> <p>Customer can request a hard copy in one of the regional offices, the document will be printed and provided at no cost. We confirmed with the Retail Operations Manager that Horizon Power published its Annual Performance Reports for the period by the date specified by the ERA.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
307A	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 91(1)</p>	A retailer must develop, maintain and implement a family violence policy to assist vulnerable customers.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of the Family Violence Policy available on the Horizon Power website, we noted that Horizon power has developed, a Family Violence Policy 2023 to assist communities who may be vulnerable and experiencing or recovering from family violence. Also, training is conducted for Family Violence Policy for CSR employees to handle the matters set out in the Family Violence Policy complying with requirement of clause 91(1) of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
307B	Electricity Industry Act, section 82	The family violence policy must provide for the details as prescribed	Priority: 4	Control Adequacy: B	Compliance Rating: 2
			<p>Through review of our Horizon Power Family Violence Policy, we noted that following items have</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings
	Code of Conduct, clause 91(2)	in subclauses 91(2)(a) to (j).	<p>been included in the policy in line with subclauses 91(2)(a) to (j).</p> <ul style="list-style-type: none"> a) Training to staff; b) (i) Privacy of customer information; c) (i) safe communication with customer; (ii) Record of communication; (iii) Agreed method of communication with customer; (d) Process where customer does not have to repeatedly provide information; (e) Support when customer is having a prepayment meter; (i) the different types of meters available to the customer; (ii) the advantages and disadvantages that may be associated with each type of meter to a customer in their situation; (iii) the process for requesting a different meter; (iv) the fact that there would not be a charge to replace the pre-payment meter with a standard meter if the customer were to choose that option; (f) Reducing and waiving of fees; (g) (i) Debt collection; (i) the potential impact of debt collection on a vulnerable customer; (ii) the extent to which another person may have contributed to an amount owing for electricity supplied to a vulnerable customer's supply address; (iii) in the case of a vulnerable customer who is a pre-payment meter customer – the provision of financial assistance;

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>(h) Process to assist a vulnerable customer who is a pre-payment meter customer to avoid disconnection;</p> <p>(i) The circumstances of a vulnerable customer before disconnecting the vulnerable customer's supply address for failure to pay a bill and</p> <p>(g) protection and operation of disconnection as per clause 92</p> <p>However, we noted that following item has not been included in the Family Violence Policy:</p> <p>(b) (ii) require the retailer to advise a vulnerable customer: about the consequences of being named on the account of a residential customer who is not a vulnerable customer.</p> <p>Based on review of Family Violence Policy as mentioned above, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period.</p>		
307C	Electricity Industry Act, section 82 Code of Conduct, clause 91(3)	The training required under subclause 91(2)(a) must satisfy at least one of the requirements detailed in subclause 91(3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that training material for family violence policy has been prepared in consultation with Lifeline (consumer representative) and training has been provided to CSRs complying with the requirement of clause 91(3) of the Code of the Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
307D	Electricity Industry Act, section 82 Code of Conduct,	If directed by the ERA, a retailer must review its family violence policy or related procedures and submit the results of the review to the ERA within	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted that Horizon power has not received any directions from ERA to review its family violence policy 2023.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 91(5)	a period specified by the ERA.			
307E	Electricity Industry Act, section 82 Code of Conduct, clause 91(6)	A retailer must consult with persons or bodies that may reasonably be expected to represent the interests of persons who may be experiencing family violence whenever the retailer is developing its family violence policy or reviewing its family violence policy because of a direction of the ERA under subclause 91(5).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we were informed that the Family Violence Policy has been prepared in consultation with Lifeline (consumer representative) complying with requirement of 91(6) of the Code of Conduct.</p> <p>Also, we noted that Horizon power has not received any directions from ERA to review its family violence policy 2023.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
307F	Electricity Industry Act, section 82 Code of Conduct, clause 92	Unless the circumstances under subclause 92(1)(a) to (e) apply, a retailer must ensure that the residential supply address of a vulnerable customer is not disconnected for a period of 9 months from the date on which the	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of ERA Manual 2023, we noted that obligations related to Family Violence Policy have come into the effect from Feb 2023. Further, we were informed that there have been no such disconnections against the customer for a period of 9 months from which retailer becoming aware of it.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		retailer becomes aware that the customer is a vulnerable customer.			
307G	Electricity Industry Act, section 82 Code of Conduct, clause 93	A retailer must not require written evidence of family violence from a customer unless the evidence is reasonably necessary to enable the retailer to determine action prescribed under subclause 93(1)(a) and (b).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of Family Violence Policy, we noted that Horizon Power does not require written evidence from a customer unless the evidence is reasonably necessary to comply with clause 93 of the Code of Conduct.</p> <p>Further through interviews with the Retail Operations Manager, we were informed that, there has been no such instances where written evidence was obtained for customers suffering from family violence.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
308	Electricity Industry Act, section 82 Code of Conduct, clause 14.1(1)	Subject to clause 14.6, a retailer must pay the stated compensation to a customer if the customer is not reconnected in accordance with the timeframes specified in Part 8.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and one sample review of service standard payments in the event supply is not reconnected within timeframes stipulated in Part 8 of the Code of Conduct, we noted that customers are required to submit a relevant claim form to Horizon Power within 3 months of initially contacting Horizon Power for reconnection to be eligible.</p> <p>CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Also, on review of Horizon Power's Customer Charter, we noted Horizon Power will make service standard payments of \$60 per day for the period that electricity remains disconnected up to a maximum of \$300 and therefore complying with the requirement as stipulated in Clause 14.1 of the Code of Conduct.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
308A	Electricity Industry Act, section 82 Code of Conduct, clause 94(1)	Unless clause 99 applies, a retailer must make the payment specified under subclause 94(2), if the retailer is required to arrange a reconnection of a customer's supply address under part 8, and either the retailer has not complied with clause 53(3) or (4) or the retailer has complied with clause 53(3), but a distributor has not complied with the timeframes set out in clause 54(4).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and walkthrough of one sample on standard service payment because of delayed reconnection, we noted Horizon Power will make service standard payments to customers in the event supply is not reconnected within timeframes stipulated in Part 8 of the Code of Conduct.</p> <p>Customers are required to submit a relevant claim form to Horizon Power within 3 months of initially contacting Horizon Power for reconnection to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity account balance in line with clause 94 of the Code of Conduct.</p> <p>If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT. On review of Horizon Power's Customer charter, we noted Horizon Power will make service standard payments of \$60 per day for the period that electricity remains disconnected up to a maximum of \$300.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
308B	Electricity Industry Act, section 82 Code of Conduct, clause 94(2)	A retailer must pay the customer \$60 for each day that the retailer or the distributor (as the case may be) is late, up to a maximum of \$300.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and walkthrough of one sample on standard service payment because of delayed reconnection, we noted Horizon Power will make service standard payments to customers in the event supply is not reconnected within timeframes stipulated in Part 8 of the Code of Conduct.</p> <p>Customers are required to submit a relevant claim form to Horizon Power within 3 months of initially contacting Horizon Power for reconnection to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>account balance in line with clause 94 of the Code of Conduct.</p> <p>If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT. Through review of Horizon Power's Customer charter, we noted Horizon Power will make service standard payments of \$60 per day for the period that electricity remains disconnected up to a maximum of \$300.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
310	<p>Electricity Industry Act, section 82</p> <p>Code of Conduct, clause 95(1)</p>	<p>Unless clause 99 applies, a retailer must make the payment specified under subclause 95(2) if the retailer:</p> <ul style="list-style-type: none"> fails to comply with any of the procedures set out under Part 6 (if applicable and other than clauses 45(3) and 46), or clause 48 or 82(1), before arranging for disconnection of, or disconnecting the customer for failure to pay a bill; or arranges for disconnection of or disconnects the customer for failure 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service standard payments to customers in the event customers are wrongfully disconnected. Customers are required to submit a relevant claim form to Horizon Power within 3 months of the disconnection to be eligible. CSRs are trained to process service standard payments in Velocity and makes payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter and one sample adjustment of wrongful disconnection, we noted Horizon Power makes service standard payments of \$100 per day for the period that electricity remains disconnected with no limits on this payment and therefore complying with the requirement as stipulated in Clause 95(1) of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		to pay a bill in contravention of clause 49, 50 or 52 for failure to pay a bill.			
312	Electricity Industry Act, section 82 Code of Conduct, clause 96	Unless clause 99 applies, if a retailer fails to acknowledge or respond to a complaint within the timeframes set out in clause 88, the retailer must pay the customer \$20.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service standard payments to customers if Horizon Power fails to acknowledge a complaint. Customers are required to submit their request for payment within 3 months of initial contact to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter, we noted Horizon Power will make a service standard payment of \$20 if Horizon Power fails to acknowledge a complaint within 5 business days or respond to a complaint within 20 business days and therefore complying with the requirement as stipulated in clause 14.4 and 96 of the Code of Conduct. However, we were informed that there were no such cases occurred during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
313	Electricity Industry Act, section 82 Code of Conduct,	Subject to clause 14.6, a distributor must pay the customer \$20 if the distributor has failed to acknowledge or respond to a complaint within the	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service standard payments to customers if Horizon Power fails to acknowledge a complaint. Customers are required to submit their request for payment within 3 months of initial contact to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 14.4(1)	timeframes prescribed in subclause 12.1(4).	<p>the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter, we noted Horizon Power will make a service standard payment of \$20 if Horizon Power fails to acknowledge a complaint within 5 business days or respond to a complaint within 20 business days and therefore complying with the requirement as stipulated in clause 14.4 and 96 of the Code of Conduct. However, we were informed that there were no such cases occurred during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
313A	Electricity Industry Act, section 82 Code of Conduct, clause 97(1) and (2)	Unless clause 99 applies, a distributor must pay the customer \$100, for each day that the customer is wrongfully disconnected, if the distributor disconnects a customer's supply address other than under the circumstances detailed in subclause 97(1)(a) and (b)	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service standard payments to customers in the event customers are wrongfully disconnected. Customers are required to submit a relevant claim form to Horizon Power within 3 months of the disconnection to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter and one sample adjustment of wrongful disconnection, we noted Horizon Power makes service standard payments of \$100 per day for the period that electricity remains disconnected with no limits on this payment and therefore complying with the requirement as stipulated in clause 97 of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
314	Electricity Industry Act, section 82	Subject to subclause 14.6, if a distributor disconnects a customer's	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code of Conduct, clause 14.5	supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer \$100 for each day that the customer was wrongfully disconnected.	<p>standard payments to customers in the event customers are wrongfully disconnected. Customers are required to submit a relevant claim form to Horizon Power within 3 months of the disconnection to be eligible. CSRs are trained to process service standard payments in Velocity and makes payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter and one sample adjustment of wrongful disconnection, we noted Horizon Power makes service standard payments of \$100 per day for the period that electricity remains disconnected with no limits on this payment and therefore complying with the requirement as stipulated in Clause 14.5 and 95(1) of the Code of Conduct.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
314A	Electricity Industry Act, section 82 Code of Conduct, clause 98(1) and (2)	Unless clause 99 applies, if a distributor fails to acknowledge or respond to a written complaint made by a customer within the timeframes set out in clause 88, the distributor must pay the customer one payment of \$20 for each complaint.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power makes service standard payments to customers if Horizon Power fails to acknowledge a complaint. Customers are required to submit their request for payment within 3 months of initial contact to be eligible. CSRs are trained to process service standard payments in Velocity and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through review of Horizon Power's Customer charter, we noted Horizon Power will make a service standard payment of \$20 if Horizon Power fails to acknowledge a complaint within 5 business days or respond to a complaint within 20 business days and therefore complying with the requirement as stipulated in clause 98 of the Code of Conduct. We were informed that there were no such cases occurred during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
315	Electricity Industry Act, section 82 Code of Conduct, clause 100(1)	A retailer that is required to make a payment under clause 94, 95 or 96 must do so in the manner specified in subclause 100(1).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and walkthrough of one sample for standard service payments, we noted Horizon Power makes service payments via the following methods to comply with clause 100(1) and 100(2) of the Code of Conduct:</p> <ul style="list-style-type: none"> • Crediting the customer's Velocity account balance; • Cheque; or • EFT payment. <p>Service standard payments made to customers are credited to the customer's Velocity account by default unless the customer requests direct payment.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
316	Electricity Industry Act, section 82 Code of Conduct, clause 100(2)	A distributor that is required to make a payment under clause 97 or 98 must do so in the manner specified in subclause 100(2).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and walkthrough of one sample for standard service payments, we noted Horizon Power makes service payments via the following methods to comply with clause 100(1) and 100(2) of the Code of Conduct:</p> <ul style="list-style-type: none"> • Crediting the customer's Velocity account balance; • Cheque; or • EFT payment. <p>Service standard payments made to customers are credited to the customer's Velocity account by default unless the customer requests direct payment.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
319	Integrated	A network operator must	Priority: 1	Control Adequacy: A	Compliance Rating: 2

<p>Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.1</p>	<p>ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p>	<p>Through the interviews with Metering services and review of Horizon Power Metrology Procedures, Westline Contracting, change of meter - Horizon Power, Meter brochures, Meter Templates - Information, Meter Type Breakdown - Current List 26-04-2023, Horizon Power has implemented following controls to ensure that the meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p> <ul style="list-style-type: none"> • HP has relevant process and procedures to maintain the quality of metering from the installations along with a detailed testing plan. Process and Procedures have been prepared with references from National Measurements Act. • Sample testing revealed that all the meters installed by Horizon Power meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines. • There are 16 meters in the network which are not replaced with AMI meters with required accuracy class. <p>In 2011, sample meter testing was performed by Formway Group, and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed. In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 49,297 advanced meters. As of completion of the AMI- exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <ul style="list-style-type: none"> • 16 meters were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 16 meters are not verified and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. • This was raised in the 2020 EIRL2 Performance Audit as non-compliant, with 19 meters associated with customers who refused to allow Horizon Power to exchange their current meter.
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Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>3 meters have been replaced over the audit period because of the customer leaving the premises.</p> <p>Based on our testing procedures, it was observed that the 16 meters associated with the customers are not changed even after reasonable efforts.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period.</p>		
320	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.2(1)</p>	<p>An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through the interviews with Metering services Manager and review of Horizon Power Metrology Procedures, Meter brochures, High Voltage Meters For Testing, Advanced meter information sheet, meter photographs, Horizon Power has implemented following controls to conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p> <ul style="list-style-type: none"> • Metrology procedure: <ul style="list-style-type: none"> • Section 2.2, 3.1.7 of metrology procedure defines that accumulation meters (Type-6) installed by Horizon Power is capable of recording both interval energy data and accumulated energy data. • Section 2.1.1, 5.48 mentions that Type 6 meters needs to have visual displays the energy consumption & production to read the electrical data at the metering point. • The spec sheets/brochure of the installed meter says that it supports the measurement of accumulated electricity production, consumption, ToU consumption, communication compatibility with RS 485, RS 232 and optical port in the meters. • A how to read brochure gives the customers clear idea of reading the advanced meters. • Considering the above technical spec sheets, metrology procedure, all the accumulation meters at horizon power have display panels to display electricity production/consumption data and in 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>the respective time bands for ToU meters.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
321	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.3(1)</p>	<p>An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.</p>	<p>Priority: 4</p>	<p>Control Adequacy: A</p>	<p>Compliance Rating: 1</p>
			<p>Through the interviews with Metering services Manager and review of Horizon Power Metrology Procedures, Meter brochures, Mandatory Link Criteria, Horizon Power has implemented following controls to ensure that interval meter has an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.</p> <ul style="list-style-type: none"> • HP's Metrology procedure section 5.7, The communications link facilitates the downloading of interval energy data through a radio communication system, telecommunications network and other communication systems to connect it to Horizon Power's metering database system (Applicable to Type 1-4). • Mandatory Link Criteria (Section 3) mandates that the Horizon Power must ensure a type 1 to type 4 metering installation includes a communication link to enable a meter of a metering point to be read from a remote location, may also require the installation of a communication link for types other than types 1 to 4. Additional installation of communication link may be required to the geographical remoteness of a metering installation makes the manual collection of interval energy data (type 5) or accumulated energy data not economically feasible. (Section 4) says that the communications link must, include a modem and isolation device approved under the relevant telecommunications regulations, to allow accumulation and interval energy data to be downloaded to the metering database via a telecommunications network. • The spec sheets of the meters support the measurement of accumulated electricity production, consumption, ToU consumption, communication compatibility with RS 485, RS 232 and optical port in the meters. • After the completion of AMI-exchange project, the project utilized installing Landis and Gyr pattern-approved U1300, U3300, and U3400 series meters, as well as EDM I pattern-approved 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>Mk 7C meters for direct connect metering installations, and Mk10E meters for low voltage current transformer metering installations. Additionally, for high voltage metering installations Landis GYR EM5400 and SEL735 meters were used. Meters capable of measuring both interval and accumulation energy data reads are accumulation meters, except where required to be interval meters of which Horizon Power has 160, these 160 meters are provided with an interface to connect to the metering database.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
322	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.3(3)</p>	<p>If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through the interviews with Metering Services Manager and review of Horizon Power Metrology Procedures, Meter brochures, Mandatory Link Criteria, MODEM & PINK PATCH LEAD, Specification - Revenue Electricity Meters, Horizon Power has implemented following controls to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.</p> <ul style="list-style-type: none"> • Metrology Procedure (5.69 - 5.75) states that the communication link may include a telephone line, network connection, modem, or any future communication technology, with an isolation device. • Specification - Revenue Electricity Meters (3.5.9) states that all the meters installed by Horizon Power comply with the communication standards prescribed in Specification - Revenue Electricity Meters (AS 62056, AS 1284). Appendix D Schedule A has the checklist as per clause 3.5.9. • Mandatory link criteria (Section 4) mention that the communications link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations, to allow accumulation and interval energy data to be downloaded to the metering database via a telecommunications network. • Explanation of a pictographic modem and patch leads by Metering Services Manager confirmed 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>that a include a modem and isolation device approved under the relevant telecommunications regulations is used in metering installations.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
323	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.3A(1)</p>	<p>A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Metering Services Manager and review of Horizon Power Metrology Procedures, Meter brochures, Alarms Management in Metering, Horizon Power has implemented following controls to ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.</p> <ul style="list-style-type: none"> • Metrology Procedure (2.5.5, 5.42) it was observed that Type 1-6 meters are selected in such a way that it can measure bi-directional energy flows. All pattern-approved meter types exchanged under the AMI-exchange project can record bi- directional energy flows in each direction. • The specifications in the meter brochure/spec sheets says that the meter is capable of recording both import and export values are measures (both 1ph & 3ph) at the metering point. • The alarm 'Reverse Energy' calls out the reverse energy flow in metering point where it is not supposed to happen. • The unexchanged 16 meters will not be allowed provision of exporting electricity from the metering point. it was confirmed that there have been no instances during the audit period where bi-directional flows were occurring at a metering point with a metering installation that is not capable of separately measuring and recording electricity flows in each direction. <p>Therefore, Horizon Power has complied with this obligation.</p>		
324	<p>Integrated Regional Licence,</p>	<p>If a user is aware of bi-directional electricity flows at a metering point</p>	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and review of alarms in metering</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	condition 4.1.1 Electricity Industry Metering Code, clause 3.3B	that was not previously subject to a bi-directional flow or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	management, it was observed that there is an alarm 'Reverse Energy' within network system to notify Horizon Power for bi-directional electricity flows occurring at a metering point which was not previously subject to bi-directional electricity flows. We were advised that there were no users on Horizon Power network during the audit period, who would be aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flow. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
325	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <ul style="list-style-type: none"> • the net electricity production transferred into the network; and • the net electricity consumption transferred out of the network. 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through the interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Meter brochures, Meter data, Horizon Power has implemented following controls to ensure that an accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point records (a) the net electricity production transferred into the network and (b) the net electricity consumption transferred out of the network. <ul style="list-style-type: none"> • Metrology Procedure (2.5.5, 5.42) states that meters associated with a metering installation at any connection point should be capable of separately registering and recording flows in each direction where bi-directional energy flows. • Meter brochures states that the meters are capable of recording both net electricity production transferred into the network that exceeds electricity consumption and net electricity consumption transferred out of the network that exceeds electricity production. Therefore, Horizon Power has complied with this obligation.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
326	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	Priority: 1	Control Adequacy: A	Compliance Rating: 2
			<p>Through the interviews with the Metering Services Manager and review of process of New Connection for Direct Connect Meter, Meter Brochures, Meter Templates - Information Meter Type Breakdown, Connection Service Order (five samples), Horizon Power has implemented following controls to ensure that there is a metering installation at every connection point on its network, the metering installation to meet the functionality requirements prescribed.</p> <ul style="list-style-type: none"> The process defined by Horizon Power for initiation of new connection, it requires to have a meter installed before billing. Once the meters are installed, Horizon Power update the service order in mData21 accordingly. Once the meters are successfully installed, fee for installation and tariff is applied in the velocity app and invoiced in the forthcoming cycle. Brochures of the installed meters confirm that the device has a visible display, have a measurement element for active energy (and active power), reactive power and apparent, permit collection of data at the level of accuracy required. Comparing the installed meter list, meter type template and brochures confirm that Horizon Power installed meters has capacity to monitor the parameters mentioned as per the code. <p>In 2011, sample meter testing was performed by Formway Group, and it was confirmed that both single and three phase meters were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed. In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 49,297 advanced meters. As of completion of the AMI - exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <ul style="list-style-type: none"> 16 meters were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 16 meters are not verified and have not been subsequently individually tested to identify whether they are meeting the accuracy 		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
			<p>requirements required of utility meters. However, Horizon Power has undertaken reasonable efforts to exchange the meters.</p> <ul style="list-style-type: none"> This was raised in the 2020 EIRL2 Performance Audit as non-compliant, with 19 meters associated with customers who refused to allow Horizon Power to exchange their current meter. 5 meters have been replaced over the audit period because of the customer leaving the premises. <p>Based on enquiries, examination of documentation, and sample testing of 10 exchanged meters, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>					
327	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.5(3)</p>	<p>For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p>	<table border="1" data-bbox="775 694 2011 762"> <tr> <td data-bbox="775 694 1120 762">Priority: 1</td> <td data-bbox="1120 694 1460 762">Control Adequacy: A</td> <td data-bbox="1460 694 2011 762">Compliance Rating: 2</td> </tr> </table> <p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedure, Horizon Power Metering Services Service Level Agreement (SLA), Meter brochure, Meter Templates - Information, Meter Type Breakdown, Meters tests, Horizon Power ensures to provide, install, operate and, maintain the metering installation in the manner prescribed.</p> <ul style="list-style-type: none"> Metrology procedures are developed with accordance with National Measurement Act, Electricity Industry (Metering) code. <ul style="list-style-type: none"> 1.2.1 gives a detailed process and procedures for the provision, installation, and maintenance of the metering installations. The procedure details the Metering installation types and accuracy requirements in line with the Electricity Industry (Metering) Code 2012. It provides guidance on measure, requirements, convey the measured energy, prepare information, assess the information (telecommunication network), auditing the metering installations. The procedure guides the users on Meter Compliance Testing and Sampling plan for all type of metering installations. Metering Services SLA defines the terms of agreement contract between the user and the 			Priority: 1	Control Adequacy: A	Compliance Rating: 2
Priority: 1	Control Adequacy: A	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>network operator (Horizon Power) including the provisions, charges and fee, invoicing and payments for the metering installations and services.</p> <ul style="list-style-type: none"> • Meter spec sheets and brochures provide the range of operating conditions (such as temperature, impulse levels etc.). • Comparing the installed meter list and brochures confirm that Horizon Power installed meters that has capacity operate as per the requirements of the code. <p>Based on enquiries, examination of documentation, and sample testing of 10 exchanged meters, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
328	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.5(4)</p>	<p>Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedure, WASIR (Western Australian Service and Installation Requirements) (Previously WDCM- Western Australia Distribution and Connection Manual), Metering SLD, Project details - SPA, Horizon Power has implemented following controls to ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.</p> <ul style="list-style-type: none"> • Section 5.10 of the Metrology Procedure defines the process, procedures and training in place to ensure that the metering points on its network are located as close as practicable to the connection point. • WASIR's Meter Equipment Location (11.5) describes that the metering location shall not be more than 30m from the supply point, it shall be on street level or one floor up or below the ground for multistorey buildings. • There is one instance in the Horizon Power's customer network where the metering location is 4km away from the supply location and placed in the substation feeder of the customer. • Horizon Power ensures that the metering point for a revenue metering installation is located as close as practicable to the supply point and the metering installations are also in accordance 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>with good electricity industry practices.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
329	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.5(6)</p>	<p>A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metering Service Level Agreement (SLA), Horizon Power has implemented controls to impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.</p> <p>Horizon Power has a defined a Service Level Agreement for Metering Services which details out the charges applicable as per the services provided. This includes the maintenance, installation and extended metering service requirements (Meter testing, as requested by user). The structure of the fees is detailed out in schedule 5 of the agreement.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
330	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.5(9)</p>	<p>If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.</p>	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures - Meter Compliance Testing and Sampling Plan, Meter change - Error, Meter Test, Horizon Power has implemented the following controls to ensure that if Horizon Power becomes aware that a metering installation does not comply with the Code, it advises affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.</p> <ul style="list-style-type: none"> • Horizon power has testing and sampling plan to check the accuracy class of the meters and selection is done using statistical sampling as per AS 1284:13. • Test reports provided demonstrate that the meters comply with the AS1284.13. If the test is failed the meter is replaced and the differences is adjusted in the customer bill. • Horizon Power tests the meter on regular basis with customer request or as per the meter 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>testing plan and arrange for replacement in case the meter tests fail</p> <ul style="list-style-type: none"> Horizon Power monitors the meter on a regular basis, if the any of the functionality in meter is affected, it arranges for replacement at the earliest Horizon power test the metering installations in a regular basis and defined a meter testing plan. The process completes with the Complex Metering and Laboratory Team Leader providing a report to the Metering Services Manager outlining the test results and analysis of any failed meter population when a population has deemed to have failed compliance testing under AS1284.13, Horizon Power ensures that it complies with the Code requirements when removing or replacing any failed meter population. In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI- exchange project in December 2016, these metering installations meet or exceed the standards required for installations. 16 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These meters are not verified and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>Therefore, Horizon Power has complied with this obligation.</p>		
331	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Revenue Electricity Meters Specification, Mandatory Link Criteria, Modem & Pink Patch Lead, Horizon Power has implemented following controls to ensure that all devices connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.</p> <ul style="list-style-type: none"> Metrology Procedure (2.2.8, 5.69 - 5.80) states that any metering installation connected in the network must include a communication link and must be connectable to the existing 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	3.7	enactments.	<p>telecommunication network.</p> <ul style="list-style-type: none"> • Mandatory Link Criteria (Section 4) requirements specifies that the metering installation in the network must comply with the Australian Standards and other required regulations of the metering code. • Revenue-Electricity-Meters-Specification (Section 2) details out the normative references list of standards used in preparing the documents and building the revenue meter specification (meter communications shall comply with AS 62056 and AS 1284). • Horizon Power's installation and inspection procedures provide for the inclusion of modem and isolation devices within metering installations (where required or otherwise), in accordance with its prescribed documents and technical specifications; the WA Distributions Connections Manual; and relevant telecommunications regulations. • Patch leads predominantly used on Horizon Power's metering installations for isolation devices were ACMA A-Tick Certified N10227 and meet applicable Australian Standards. <p>Therefore, Horizon Power has complied with this obligation.</p>		
332	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Data Management & Integration Manager and review of screenshots of server management, it was concluded that Horizon Power has the following controls to ensure that consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.</p> <ul style="list-style-type: none"> • Horizon Power's IP network employs robust security measures to safeguard the data stored in mData21. These measures include stringent access controls implemented at the Windows active directory level, based on roles, ensuring that only authorized personnel can access the data. Furthermore, remote access to the mData21 platform requires two-factor authentication, specifically a token, providing an additional layer of security. • To identify and mitigate unauthorized access attempts, intrusion detection dashboards are 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>utilized. These dashboards actively monitor and flag any unsuccessful attempts made to breach the network. Whenever such incidents occur, a thorough investigation is conducted to identify the source and nature of the intrusion, ensuring the overall security of the system.</p> <ul style="list-style-type: none"> The meters are equipped with battery-operated switches, preventing any tampering attempts that may compromise the accuracy or functionality of the meters. <p>Therefore, Horizon Power has complied with this obligation.</p>		
333	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 3.9(3)</p>	<p>Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.</p>	Priority: 1	Control Adequacy: A	Compliance Rating: 2
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Revenue Electricity Meters Specification, Mandatory Link Criteria, Modem & Pink Patch Lead, Horizon Power has implemented following controls to ensure that each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations.</p> <ul style="list-style-type: none"> Meter brochures convey the information about the design accuracy class of the meter which are observed to be in line with the SWIN requirements Test sampling accuracy test is done in accordance with 'AS 1284.13' which includes is based on the Annual throughput at connection point, meter type and reactive energy measurement <ul style="list-style-type: none"> Maximum allowable overall error at full load - Active (kWh) & Reactive (kVAR) Minimum acceptable class or standard of components. Clock error (seconds per month); In 2020 EIRL2 Performance Audit this was reported as non-compliant, with 16 meters associated with customers who refused to allow Horizon Power to exchange their current meter. 3 meters have been replaced over the audit period because of the customer leaving the premises. <p>Based on enquiries, examination of documentation, and sample testing of 10 exchanged meters, it was concluded that there were adequate controls with no improvement needed, however Horizon</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		
334	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Meter brochures and Specifications of VT and annual through, Horizon Power has implemented following controls to ensure that a metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.</p> <ul style="list-style-type: none"> • Meter brochures convey the information about the design accuracy class of the meter which are observed to be in line with the requirement • It was observed that Horizon Power has installed VT of accuracy class of matching the requirements of accuracy class of Type-2 meters. • Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and the Horizon Power Metrology Procedure 2017 and we noted that the meters comply to the obligation requirement. <p>Therefore, Horizon Power has complied with this obligation.</p>		
335	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on our discussion with the Metering Services team, and review of metering documents, we noted that:</p> <ul style="list-style-type: none"> • Per the Metrology Procedure and Metering Management Plan, Horizon Power confirms its meters meet the required accuracy requirements under the Code. • Where a metering installation is identified as measuring outside the allowed accuracy limits, Horizon Power will replace the meter with one that is measuring accurately, or instruct the 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code, clause 3.9(9)		<p>customer to replace the metering installation with one that meets the prescribed accuracy requirements.</p> <ul style="list-style-type: none"> The only circumstance in which Horizon Power would consider applying compensation to a metering installation is if replacement of the meter or alteration to the metering installation so that it meets the prescribed accuracy requirements, is not possible. Even in this scenario, Horizon Power would apply compensation within its digital systems (i.e. mData21) rather than within the physical meter itself. <p>We were informed that there were no instances where compensation was carried out within a meter on Horizon Power's network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
336	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Meter brochures and Specifications of VT and annual throughput, Horizon Power has implemented following controls to ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.</p> <ul style="list-style-type: none"> Section 5.58 of Metrology Procedure gives direction that any programmable settings available within a metering installation, data logger or any peripheral device, which may affect the resolution of displayed or stored data, must meet the relevant requirements of AS1284 and must comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act. Program Files of list of meters installed provides the details of current default program for meter including Meter Info & System Parameters, features available in Meter, Alarms, 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		National Measurement Act.	measurement convention, tariff, prepayment, load profile configured to use the Cybertec X400 modem. Therefore, Horizon Power has complied with this obligation.		
337	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, TDT Performance slides - April Reporting Period, Metering Services Performance Measures, Horizon Power has implemented following controls to ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p> <ul style="list-style-type: none"> • Metrology Procedure it was observed that metering procedures are developed consistent with good industry practice to measure, record data and permit collection of data from the metering installation from time to time. • As per the Meter performance assessment, reliability of metering installations is observed to be more than 99%. • Enquiring about the process, the meter availability is a detective process with monitoring alarm in SSN-UIQ if the communication is not available between the meter and the meter is investigated for faults. <p>Therefore, Horizon Power has complied with the obligation during the audit period.</p>		
338	Integrated Regional Licence, condition 4.1.1	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Mandatory Link Criteria, Service Level Agreement (SLA), Horizon Power has implemented the following controls to confirm that if an outage or malfunction occurs to a metering installation, Horizon Power would repair the metering installation in accordance with the applicable</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry Metering Code, clause 3.11(2)	accordance with the applicable service level agreement.	<p>service level agreement. Specifically:</p> <ul style="list-style-type: none"> • Metrology procedures (5.38, 5.56, 5.68) clearly defines out about the outages, malfunction in the metering installations repairs must be made as soon as practicable, and in any event within the period specified within the relevant service level agreement. • Mandatory link criteria says that outage or malfunction occurs to a communications link, repairs must be made in accordance the applicable service level agreement. • As per Service 24 of Extended Metering Services of SLA says that the Repairs to a Metering Installation conducted on the Retailer's or Customer's behalf within 20 business days and the price is calculated is in accordance with Table 5, 6 of schedule 5. <p>We were advised that there was no outage or malfunction of the metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
339	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Mandatory Link Criteria, Service Level Agreement (SLA), Horizon Power has implemented the following controls to confirm that a Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.</p> <ul style="list-style-type: none"> • Metrology procedures (2.4.3) in maintenance of metering installation calls out that, a Code Participant who becomes aware of an outage or malfunction of a metering installation or any of its components must advise Horizon Power as soon as practicable. • Section 3.5 outlines the business rules and process in which the code participant has to inform/request Horizon Power about the metering malfunction/outage as per the Service 24 obligations. <p>We were advised that there are no Code participants on the network who would become aware of</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			outage or malfunction of the metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
340	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, High Voltage Meters for Testing, Meter Tests, Horizon Power has implemented the following controls to ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.</p> <ul style="list-style-type: none"> Appendix-1 of metrology procedure details out the process, procedure, and standards for testing the meters in the network. It was observed that Horizon Power has an ongoing meter testing plan conducted in accordance with AS1284.13 High Voltage Meters for Testing document show the list of HV meters tested during the audit period. Sample testing confirms that Horizon Power follows applicable standards in testing the meters Therefore, Horizon Power has complied with this obligation. 		
341	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.11A(2)	Subject to clause 3.11A(3), if a population of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	Priority: 1	Control Adequacy: A	Compliance Rating: 2
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, Population testing, Horizon Power has implemented the following controls to ensure that if a population of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.</p> <ul style="list-style-type: none"> Meter Compliance Testing and Sampling Plan section 4 - 10 (Metrology Procedure) details out the process of choosing the meter for population testing, accuracy class, sampling methodology and other adhoc processes related to population testing. It also details out the compliances related to performance characteristics of the meter. As per Section 11, Where a population is deemed to have failed compliance testing under AS1284.13, Horizon Power will ensure it 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>complies with the Code requirements when removing or replacing any failed meter population.</p> <ul style="list-style-type: none"> Population testing was conducted in 2018 and observed that the meters have passed the tests specified in the metrology procedure. <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 49,297 advanced meters. As of completion of the AMI- exchange project in December 2016, these metering installations meet or exceed the standards required for installations. 16 meters were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 16 meters are not verified and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters.</p> <p>Based on our testing procedures, it was observed that the 16 meters associated with the customers have not been changed even after reasonable efforts, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
342	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Metering Services Manager and review of Horizon Power Metrology Procedures, a sample Single Line Diagram (SLD), we confirmed that Horizon Power has implemented the following controls to ensure that each metering installation complies with at least the prescribed design requirements.</p> <ul style="list-style-type: none"> Metrology Procedure <ul style="list-style-type: none"> As per the (Section 2.1) Installation of meter, Horizon Power will ensure (i) the CT cores of revenue metering installations must not be used for any purpose other than revenue metering and check metering, (ii) the CT cores of Types 1 and 2 check metering installations must not be used for other purposes unless with the written approval of Horizon Power, (iii) 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>if only one set of VT secondary winding is provided for a Type 1 or 2 revenue metering and check metering installation, then the voltage supplies to both metering installations must be separately fused.</p> <ul style="list-style-type: none"> Section 5.22 - 5.26 details about the accuracy class, requirements, type of installation. 5.24 guides that a current transformer core and secondary wiring associated with the revenue meter may not be used for other purposes. Section 5.19 outlines that check metering must use separate current transformer cores and separately fused voltage transformer secondary circuits preferably from separate secondary windings. Through sample testing of one SLD, it was noted that check meter and revenue meter for Current Transformer (CT) and Voltage Transformer (VT) are not used for any other purpose except for the check and revenue metering <p>Therefore, Horizon Power has complied with this obligation.</p>		
343	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, one sample SLD, we confirmed that Horizon Power has implemented the following controls to confirm that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.</p> <ul style="list-style-type: none"> Metrology Procedure <ul style="list-style-type: none"> Sections 5.22 - 5.31 details about the requirements of the instrument transformers. According to Section 5.81 under purchase of new metering equipment, All Horizon Power meters must comply with the National Measurement Act. All new purchased current transformers must comply with AS60044.1. All new purchased voltage transformers must comply with AS60044.2. All new purchased meters must comply with AS1284. All new 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		any requirements specified in the applicable metrology procedure.	<p>purchased meters must comply with the relevant specifications of the National Measurements Institute's M6.</p> <ul style="list-style-type: none"> For High Voltage (HV) metering installations, the consumer provides the Network Operator with the copies of CTs and VTs, other test reports in accordance to the metering code. All the requirements of the instrument transformers have to be in line with the National Measurement Institute under the National Measurement Act. Sample testing of specification of CT & VT for one of the installations, it was observed that the accuracy class of the instrument transformers are meeting the design requirements prescribed by Horizon Power Metrology procedure and WASIR. <p>Therefore, Horizon Power has complied with this obligation.</p>		
344	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of Horizon Power Metrology Procedures, photographs - Metering installation in site, SLD - metering and with fuses, Horizon Power has implemented the following controls to ensure that isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.</p> <ul style="list-style-type: none"> Meter testing process follows a standard practice of removing the meter from the metering installation and replacing it with a new or reconfigured meter. This enables the maintenance and testing of metering equipment to be conducted in-house at Horizon Power's Bentley office, using state-of-the-art, accredited testing equipment or at accredited third-party labs. Photographs and SLD clarifies that each installation on Horizon Power's network is equipped with fuses, which facilitate the isolation of metering equipment, thereby allowing maintenance to be carried out on-site. <p>Therefore, Horizon Power has complied with the obligation during the audit period</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
345	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of 'ProjectWise' screenshots, we noted that Horizon Power maintains drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.</p> <p>Through review of screenshots provided, it was noted that Horizon Power maintains copies of the required CT and VT drawings and SLDs connected to its network within ProjectWise.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
346	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager, we were advised that there are no users on the Horizon Power's network, and hence, no instances were available with regards to metering installation to the user during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
347	Integrated Regional Licence, condition 4.1.1	A partial check metering installation must be physically arranged in a manner determined by the network operator,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures, Documentation - ProjectWise, check meter installation & drawings, we noted that Horizon Power ensures a partial check metering installation is physically arranged in a manner aligned to good</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry Metering Code, clause 3.13(3)(c)	acting in accordance with good electricity industry practice.	<p>electricity industry practice.</p> <ul style="list-style-type: none"> Metrology procedure (Section 5.8) details out the requirements of installing partial check meters. Horizon Power installs and maintains all meters in-house, including high voltage installations and associated check meters. Documentation, including photographs of installations and completed service orders, are stored digitally and within ProjectWise. All the metering installations are provided by the in-house team in Horizon Power. All check meters are physically arranged by Horizon Power in accordance with the metrology procedure and metering code, also all the partial check meters are connected in such a way that it reads the same load as that of revenue meters, all the drawings are stored digitally in ProjectWise. <p>Therefore, Horizon Power has complied with this obligation.</p>		
348	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures, Documentation - ProjectWise, Check meter installation & Drawing, Horizon Power has implemented the following controls to ensure that check metering installation for a metering point comply with the prescribed requirements.</p> <ul style="list-style-type: none"> Section 5.18 of Metrology procedure says that if a separate check meter is required, the check meter must not exceed twice the error level permitted under the Code for the revenue meter for the metering point. Enquiring Metering Services Manager, it was mentioned that in during installation of check meters, Horizon Power details out the cost estimate and benefit analysis for installing check meters with accuracy class. Evidencing the meter read in SSN-UIQ, check meter and revenue meters installed read the same load conditions. They are connected in a way that it measures the same load conditions. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
349	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).	Priority: 2	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures, Horizon Power has implemented the following controls to ensure that if metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1, then the Horizon Power takes the actions specified to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 of the Metering Code.</p> <ul style="list-style-type: none"> Section 5.4 of Metrology procedure guides the team that if the CT & VT in service do not meet the requirement of the code at the time of code commencement, Horizon Power upgrades meters to higher accuracy class, apply accuracy calibration factors in the meter to accommodate the CT & VT errors. It was observed that all the metering installations are carried out by Horizon Power only and the metering installations are chosen with the required accuracy class mentioned in the Code (Table 3A of Appendix-1). The code was recently amended on 28 August 2021 and there were no upgrades in the Table 3A of appendix 1 in metering code <p>We were advised that there was no relevant activity occurred during the review period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
355	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on discussions with the Metering Services Manager and review of the Metrology procedures and Service Level Agreement (SLA), Horizon Power has implemented the requirements of the Metering Code as part of SLA Service 27 - Enhanced Technology Features - a service to install one or more of the Enhanced Technology Features to a Meter within agreed timeframe.</p> <p>We were advised that there were no Code participants on the Horizon Power network and hence, there were no instances of metering installation to the user during the audit period. Therefore, a</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code, clause 3.20(1)		control assessment for this obligation was not performed and cannot be rated for compliance.		
356	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on discussions with the Metering Services Manager and review of the Metrology procedures and Service Level Agreement (SLA), Horizon Power has implemented the requirements of the Metering Code as part of SLA Service 27 - Enhanced Technology Features - a service to install one or more of the Enhanced Technology Features to a Meter within agreed timeframe and the price is calculated is in accordance with Table 5, 6 of schedule 5.</p> <p>We were advised that there were no Code participants on the Horizon Power network and hence, there were no instances of metering installation to the user during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
357	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures and time sync screenshots, Horizon Power has implemented the following controls to ensure an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.</p> <ul style="list-style-type: none"> • Metrology procedure defines the accuracy requirements for different types of meters containing an internal real time clock. • Whenever a drift in time between real time and the meter clock, an alarm is triggered to the metering personnel and the clock is synchronized as per the actual time. • Sample testing of time drift logs, it was observed that the drifts are synced with the internal clocks to ensure consistency. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
358	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures and meter brochures, Horizon Power has implemented the following controls to ensure measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.</p> <ul style="list-style-type: none"> • Metrology procedure 5.64 mandates meters to have a data logger with capacity of storing energy data for at least 35 days for Type 1-5 meters. • Analysing the meter list and the meter brochures, installed meters list Metering Services Manager, all the meters in the horizon power network will have a communication device and has the storage capacity for more than 35 days/200 days. <p>Therefore, Horizon Power has complied with this obligation.</p>		
359	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and review of the Metrology procedures, Metering software licences, Request for Quotation Document, Horizon Power has implemented following controls to ensure providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.</p> <ul style="list-style-type: none"> • Section 2.2.7 of Metrology procedure recognise the requirements to maintain a licence for access to applicable metering software • All the metering data is centrally stored in mData21 for which Horizon Power owns the licence to operate. • As per 4.15 - Meter Programming and Diagnostics Software requires meter supply vendors to provide metering software capable of fully programming the meters and carrying out diagnostics. The software shall be capable of being installed on multiple windows workstations and portable laptops. Software will be evaluated for ease of use and functionality. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> Meter security shall comply with Electricity Industry (Metering) Code 2012 Section 3.8 Security of metering installations and AS 1284 Parts 11 & 12 Section 16 Security. <p>Therefore, Horizon Power has complied with the obligation during the audit period.</p>		
360	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Metering Services Manager and review of the Metrology procedures and Meter brochures, Horizon Power has implemented the following controls to ensure signals are provided from the meter for the user or the user's customer are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.</p> <ul style="list-style-type: none"> Section 5.53 ensures that Horizon Power provides secure access to the electronic signal from the measurement element. Meter specification and brochures and discussion with Metering Services Manager it was understood that meter by itself manages the requirement of relays and electronic buffers. Modems are 12/24 volt and supplied with power from the meters so they are unable to send electrical pulses that could damage a customer's installations. <p>Therefore, Horizon Power has complied with this obligation.</p>		
361	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and review of the SLA and Communication Rules, we noted that Horizon Power will provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code. We were advised that there were no Code participants or users on the Horizon Power network and hence, there were no instances of signals being provided from the meter for the user or the user's customer. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		3.23(c) of the Code.			
362	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.24A(1)	If a retailer requests a network operator to install a pre-payment meter at a connection point, then the pre-payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager and Retail operations Manager, it was noted that Horizon Power is currently the retailer and network operator. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
363	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.24B(1)	If a retailer requests a network operator to replace a pre-payment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager and Retail operations Manager, it was noted that Horizon Power is currently the retailer and network operator. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
364	Integrated Regional Licence,	A person must not install a metering installation on a network unless the	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager, it was concluded that Horizon Power does		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	condition 4.1.1 Electricity Industry Metering Code, clause 3.27	person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	all the metering installations with in-house team and had not contracted out metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance		
365	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager, it was concluded that Horizon Power does all the metering installations with in-house team and had not contracted out metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance		
366	Integrated Regional Licence, condition 4.1.1 Electricity Industry	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services Manager and Metering Data Management Team Lead, and review of mData21, SSN-UIQ, meter data extract, Horizon Power has established, maintained, and administered a metering database containing standing data and energy data for each metering point on its network. Evidencing the data in the secure server for exchanging SFTP data, Horizon Power has established,		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Metering Code, clause 4.1(1)	network.	maintain and administer me in metering database containing standing data and energy data Therefore, Horizon Power has complied with this obligation.		
367	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Senior Manager Technology Shared Services and review of Information Technology Policy and Guidelines, Access Control Guideline, Horizon Power has implemented following controls that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).</p> <ul style="list-style-type: none"> Horizon Power manages all metering services in-house, with the storage of meter data within mData21. Horizon Power has implemented measures to: <ul style="list-style-type: none"> All Internet access from Horizon Power's network must be via Horizon Power's firewall, any attempt to circumvent Internet traffic flow will be considered a breach, flagged and investigated Ensures data held in mData21 is secured from unauthorised local or remote access by granting role-based access at the Windows active directory level and two factor authentication, token, for remote access into the mData21 platform. Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network. Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels. <p>Therefore, Horizon Power has complied with this obligation.</p>		
368	Integrated	A network operator must	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.1(3)	prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	Through interviews with the Senior Manager Technology Shared Services and review of the IT Disaster Recovery (DR) Strategy, Horizon Power has implemented the following controls that it prepares and, if applicable, implements a DR plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster. <ul style="list-style-type: none"> • Horizon power has defined a detailed governance structure for disaster recovery plan, disaster recovery objectives and recover the application. • Expectation of data recovery in disaster event shall be within 48 hours, the process is tested with (a) unscheduled Process ('mock') Testing and (b) Scheduled, DR (Technical) Testing. However, there was no instance during the audit period, and therefore, a control assessment for this obligation was not performed and cannot be rated for compliance		
370	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	Priority: 3	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services team and review of the SLA and Communication Rules approved by the ERA in November 2021, we noted as follows: <ul style="list-style-type: none"> • As part of standing data list per the Communication Rules and SLA, the following data points are included aligned to the Table 2 of the Metering code: <ol style="list-style-type: none"> 1. The length of network between the metering point and the substation 2. Whether or not the customer associated with the metering point is a contestable customer 3. (a) details in accordance with the communication rules of the user which is the current user for the metering point; and 3 (b) except in the case of the user who was the current user for the metering point at the time the 2005 Metering Code commenced – the transfer date on which the user became the current user: and 3 (c) a change history enabling the determination of which user was the current user for any day after the time this clause 4.3 commenced 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>4. Instrument transformer (CT & VT) connected ratio 5. Reference to current test and calibration program details, test results and test certificates 6. Calibration tables, where applied to achieve metering installation accuracy 7. Data validation and substitution algorithms 8. Data comparison techniques 9. Processing of alarms 10. Check metering compensation details</p> <p>In accordance with the clause 4.3(3) of the Metering Code 2012, Horizon Power has removed, or modified the fields as prescribed in the Code. For example, the length of network between the metering point and the substation is not included within the Standing Data, as it was not considered to be a cost-effective field and would require significant investment. However, these edits to the prescribed fields were approved by the ERA as part of the review and approval process for the Communication Rules and ERA.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
371	Integrated	If there is a discrepancy	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.4(1)	between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	<p>Through interviews with the Metering Services Manager and review of the Metrology Procedures and Meter Brochures, Horizon Power has covered this requirement as part of Section 4.2.8 of the Metrology Procedures. This section outlines that in case of discrepancy in energy data stored in the meter or meter's associated data logger; and energy data stored in the metering database in respect of the respective meter or meter/associated data logger, the energy data stored in the meter or meter's associated data logger is prima facie evidence of the amount of electricity supplied to that metering point.</p> <p>There was no discrepancy between energy data held in a metering installation and in the metering database during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
374	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager, we were advised that there were no Code participants or users on the Horizon Power network and hence, there were no such instances. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
375	Integrated Regional Licence,	If a network operator is notified of a change to, or inaccuracy in, an item	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager, we were advised that there were no Code</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	condition 4.1.1 Electricity Industry Metering Code, clause 4.6(2)	of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	participants or users on the Horizon Power network and hence, there were no such instances. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
376	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager and Metering Data Team Lead, and review of the SLA, we noted that Horizon Power notifies user within 2 business days after the update to standing data for a metering point. There has been no relevant activity during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		a period or periods when the previous user was the current user.			
377	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager, we were advised that there were no Code participants or users on the Horizon Power network and hence, there were no such instances. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
378	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager, we were advised that there were no Code participants or users on the Horizon Power network and hence, there were no such instances. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.8(3A)	the network operator which provides 'read only' access.			
379	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Senior Manager Technology Shared Services and review of the IT security environment, we noted the following:</p> <ul style="list-style-type: none"> Horizon Power ensures data held in mData21 is secured from unauthorised local or remote access by granting role-based access at the Windows active directory level and multi factor authentication, for remote access into the mData21 platform Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels. <p>Therefore, Horizon Power has complied with this obligation.</p>		
380	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Senior Manager Technology Shared Services and review of the IT security environment, we noted the following:</p> <ul style="list-style-type: none"> Horizon Power ensures data held in mData21 is secured from unauthorised local or remote access by granting role-based access at the Windows active directory level and multi factor authentication, for remote access into the mData21 platform Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network Authenticate the interfacing between systems communicating with mData21 through encrypted 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			channels and SFTP channels. Therefore, Horizon Power has complied with this obligation.		
381	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Data Management & Integration Manager and walkthrough of the server security, Horizon Power has implemented following controls to ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.</p> <ul style="list-style-type: none"> • Access to the metering data base is completely secured with rights and personnel with access can only enter the database for monitoring. • It allows the administrator to provide access as per requirement, and only the administrator can provide access to the database and personnel with access can only view the details in the database and monitored. <p>Therefore, Horizon Power has complied with this obligation.</p>		
382	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Data Management & Integration Manager and walkthrough of the server security, Horizon Power has implemented following controls to ensure that energy data in the metering database is retained for each metering point on its network, including any energy data that has been replaced for at least the 5 years 11 months.</p> <ul style="list-style-type: none"> • Energy data is efficiently managed all metering services in-house by utilizing mData21 as the primary metering database by obtained at 15-minute intervals from advanced metering infrastructure. This comprehensive data repository serves multiple purposes, including billing 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.9	with the level of accessibility, prescribed.	<p>and reference requirements.</p> <ul style="list-style-type: none"> mData21 exhibits robust functionality, enabling seamless extraction of energy data from the Meter Data Repository (MDR). This capability facilitates efficient retrieval of energy data for both billing processes and as a point of reference. Also, no archiving activities are carried out within the systems, ensuring that no data is ever removed. As a result, the complete history of energy readings for each metering point on Horizon Power's network is maintained without any risk of data loss. <p>Therefore, Horizon Power has complied with this obligation.</p>		
383	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.1(1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Metering Services Manager, Metering data management team lead and review of Metering SLA, Horizon Power has implemented following controls to ensure that it use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement</p> <ul style="list-style-type: none"> SLA details the list of metering services a code participant can obtain from Horizon Power. The metering services range from data collection provision, technical services and additionally the extended metering services (Service 1 - 27). The fee charged for these services are detailed in schedule 5 of the metering service level agreement. The request from the code participant is processed in relation with the communication rules. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
384	Integrated Regional Licence, condition 4.1.1	Without limiting subclause 5.1(1), a network operator must: <ul style="list-style-type: none"> expeditiously and diligently process all 	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with Metering Services Manager, Metering data management team lead and review of Metering SLA, Horizon Power has implemented following controls to ensure that it expeditiously and diligently process all requests for a service level agreement, negotiate in good</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry Metering Code, clause 5.1(2)	<p>requests for a service level agreement;</p> <ul style="list-style-type: none"> negotiate in good faith with a Code participant regarding the terms for an agreement; and to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire. 	<p>faith with a Code participant regarding the terms for an agreement and to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.</p> <ul style="list-style-type: none"> SLA details the list of metering services a code participant can obtain from Horizon Power. The metering services range from data collection provision, technical services and additionally the extended metering services (Service 1 - 27). The fee charged for these services are detailed in schedule 5 of the metering service level agreement. Any request from the code participant should follow the communication rules. Horizon Power diligently processes all requests for a service level agreement and as per the timelines prescribed in communication rules. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
385	Integrated Regional Licence, condition 4.1.1 Electricity	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services team and review of the Automated Meter Reading Process, Metering data transfer into mData21 and Metrology Procedures, Horizon Power has implemented the following controls to ensure for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Metering Code, clause 5.3(1)	database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	<p>later than 2 business days after the date for the scheduled meter reading for the metering point.</p> <ul style="list-style-type: none"> As per the Automated meter reading process: <ul style="list-style-type: none"> The system will retrieve a read for a meter on the day of the scheduled read date. If a read can be obtained on the 'Day of the Read' the system can obtain a read from the data collected 48hrs prior or 48hrs post the scheduled read date Allowing 5-day timeframe to obtain a read. The data is transferred into the database every 6 hours from the metering point. Metrology Procedure Section 3.2.1 states that Horizon Power ensures that a schedule is developed and maintained to determine the scheduled dates for reading each metering installation in accordance with clauses 5.3 and 5.4 of the Code, or such time specified in the applicable service level agreement. <p>Therefore, Horizon Power has complied with this obligation.</p>		
385A	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.3(2)	Energy data obtained and transferred under clause 5.3(1) must include: <ul style="list-style-type: none"> for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services team and review of the Automated Meter Reading Process, Metering data transfer into mData21 Metrology Procedure, Horizon Power has implemented the following controls to ensure that for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point.</p> <ul style="list-style-type: none"> The system will retrieve a read for a meter on the day of the scheduled read date. If a read can be obtained on the 'Day of the Read' the system can obtain a read from the data collected 48hrs prior or 48hrs post the scheduled read date Allowing 5-day timeframe to obtain a read. The data is transferred into the database every 6 hours from the metering point. Section 3.2.1 states that Horizon Power ensures that a schedule is developed and maintained to 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		metering point; and <ul style="list-style-type: none"> on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters. 	determine the scheduled dates for reading each metering installation in accordance with clauses 5.3 and 5.4 of the Code, or such time specified in the applicable service level agreement. Therefore, Horizon Power has complied with this obligation.		
386	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services team and review of the Metrology Procedures, Automated Meter Reading Process, must read process and service orders, Horizon Power has implemented the following controls to ensure that for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes. <ul style="list-style-type: none"> Section 3.2.1 states that Horizon Power ensures that a schedule is developed and maintained to determine the scheduled dates for reading each metering installation in accordance with clauses 5.3 and 5.4 of the Code, or such time specified in the applicable service level agreement. Automated meter reading process says about the transfer of metering energy data is transferred into the metering database (mData21) every 6 hours, post processing of data with required validation and billing If there are no actual meter read for 11 months, the field team reaches the site location to get the actual meter read from the metering point. After reviewing of 5 sample must read service orders, it was observed that Horizon Power conducts on site visits to ensure that a meter read is obtained with instruction on the service order "No read obtained for over 10 months. Must obtain actual read to meet compliance requirements". 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with the obligation during the audit period.		
387	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services team and review of the Metrology procedures, Automated Meter Reading Process, must read process and service orders, Horizon Power has implemented the following controls to ensure that meter reading of is taken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.</p> <ul style="list-style-type: none"> Section 3.2.1 states that Horizon Power ensures that a schedule is developed and maintained to determine the scheduled dates for reading each metering installation in accordance with clauses 5.3 and 5.4 of the Code, or such time specified in the applicable service level agreement. All* the meters installed in the Horizon Power network are AMI meters and capable of reading the meter data from the metering installation and transferring the data every 6 hours into the metering database. Automated meter reading process says about the transfer of metering energy data is transferred into the metering database (mData21) every 6 hours, post processing of data with required validation and billing. Only if there are no actual meter read for 11 months, must read service order is raised to the field team to get the actual meter read from the metering point. After reviewing of 5 sample must read service order, it was observed that Horizon Power conducts on site visits to ensure that a meter read is obtained by Horizon Power personnel. The details of the personnel (name and employee number) who has taken the meter read along with the date is recorded in the service order along with the meter reading. <p>Therefore, Horizon Power has complied with this obligation.</p>		
389	Integrated Regional Licence,	Subject to subclause 5.5(2A)(b), a network operator may impose a	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services team and review of the Metrology Procedures,		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	<p>condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 5.5(2)</p>	<p>charge for the provision of data, but only if</p> <ul style="list-style-type: none"> a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions. 	<p>Metering SLA, Metering service request, Horizon Power has implemented following controls to ensure that it may impose a charge for the provision of data (a) a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user (b) if a customer has given a direction</p> <ul style="list-style-type: none"> Service level agreement details the list of services offered under metering requirements and fee charged for each service in schedule 5 Metering services request shall be obtained from the customer authorized person and the data request for large use customers are sent to metering department. For residential customers, the data is requested through the Customer Service and Community team and meter data is provided after verifying the details of the customer (From metering services). Any requirements of standing data, energy data on a verbal basis is provided by a CSR over call with call centre executives On sample testing of energy data request and reply from Horizon Power, it was observed that Horizon Power provides energy data at free of cost for two instances during a given year. Therefore, Horizon Power has complied with this obligation. 		
390	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause</p>	<p>A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.</p>	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services team and review of the Metrology Procedures, Metering service request, Horizon Power has implemented the following controls to ensure that it does not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.</p> <ul style="list-style-type: none"> Metering services request shall be obtained from the customer authorized person and the data request for large use customers are sent to metering department. For residential customers, the data is requested through the Customer Service and Community team and meter data is provided after verifying the details of the customer (From Metering 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	5.5(2A)		<p>Services).</p> <ul style="list-style-type: none"> Any requirements of standing data, energy data on a verbal basis is provided by a CSR over call with call centre executives <p>On sample testing of energy data request and reply from Horizon Power, it was observed that Horizon Power provides energy data at free of cost for two instances during a given year. Therefore, Horizon Power has complied with the obligation during the audit period</p>		
391	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services team and review of the Metrology Procedures, Horizon Power has implemented following controls to provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point within the timeframes</p> <ul style="list-style-type: none"> As per section 3.3.4 of Metrology Procedure, after conducting a meter reading and obtaining energy data for a metering point, Horizon Power will provide access to that energy data to the user for the metering point and the IMO in accordance with clauses 5.6 and 5.7 of the Code and in accordance with the Communications Rules. It was confirmed that the IMO was replaced with the AEMO (Australian Energy Market Operator) in June 2017, and they had not made any requests during the audit period. After the walkthrough of data transfer to the users, Horizon Power provides energy data on daily basis to the users as per SLA via SFTP (Secure File Transfer Protocol) server. <p>Therefore, Horizon Power has complied with this obligation.</p>		
391A.	Integrated Regional Licence, condition 4.1.1	A network operator must provide validated, and where necessary substituted or estimated, interval energy data for	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services team and review of the Metrology Procedures, Horizon Power has implemented the following controls to provide validated, and where necessary substituted or estimated, interval energy data for a metering point to AEMO as per the SLA</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry Metering Code, clause 5.6(3)	a metering point to AEMO before 5pm on the first business day after the network operator obtains energy data for the metering point under clause 5.3(1)(a), or such other time as agreed in writing.	<p>As per section 3.3.4 of the Metrology Procedure, after conducting a meter reading and obtaining energy data for a metering point, Horizon Power will provide access to that energy data to the user for the metering point and the IMO in accordance with clauses 5.6 and 5.7 of the Code and in accordance with the Communications Rules. It was confirmed that the IMO was replaced with the AEMO in June 2017, and they had not made any requests during the audit period.</p> <p>Horizon Power did not have any relevant activity and there were no instances of users on the network during the audit period, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
391B.	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.6(5)	<p>Energy data provided under clauses 5.6(1) and 5.6(3) must include:</p> <ul style="list-style-type: none"> for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and on and from five-minute settlement commencement, five-minute interval energy data in 	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services team and review of the Metrology Procedures, Horizon Power has implemented following the controls to ensure that a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point. As per section 3.3.4 of the Metrology Procedures, after conducting a meter reading and obtaining energy data for a metering point, Horizon Power will provide access to that energy data to the user for the metering point and the IMO in accordance with clauses 5.6 and 5.7 of the Code and in accordance with the Communications Rules.</p> <p>Horizon Power did not have any relevant activity during the audit period, and therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		respect of 5MS meters.			
392	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services team and review of the Metrology Procedures, it was noted that Horizon Power does not provides replacement energy data to the user for the metering point within the timeframes prescribed in Metering SLA. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
393	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services Manager and review of Metrology Procedures, Communication Rules and SLA, we noted that Horizon Power has established controls to provide information to user per clause 5.8 of the Metering Code. Therefore, Horizon Power has complied with this obligation.		
394	Integrated	A network operator must	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.9	provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	Based on enquiries with the Metering Services team and review of the Communication Rules and SLA, Horizon Power provides standing data, provided to or obtained by it under this Code, to users where required to do so as per the Communication Rules and SLA. However, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
395	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on enquiries with the Metering Services team, and review of the Communication Rules and SLA, we noted that Horizon Power will provide the Standing data to Code participants on request. Horizon Power will send standing data to a Code participant, and the format of the standing data details for the following four processes:</p> <ul style="list-style-type: none"> ○ Partial standing data (On Request) ○ Full standing data (On Customer Transfer) ○ Standing data (On Data Change) ○ Full standing data (All) <p>However, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
397	Integrated Regional Licence, condition	If a user gives a network operator an energy data request for a metering point in accordance with	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Based on enquiries with the Metering Services team, and review of the Communication Rules and SLA, we noted that Horizon Power has the following controls to provide energy data on request for		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry Metering Code, clause 5.12(1)	the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	<p>a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.</p> <ul style="list-style-type: none"> Section 3.5 says that Energy data and standing data may be requested by Code participants in accordance with the Codes. Specifics of transactions are detailed in Schedule 1 (Communication Procedures) of the Communication Rules. Schedule 1 details out the process and procedures followed by Horizon Power and user to request the energy data along with duration <p>However, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
398	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.13	<p>If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must:</p> <ul style="list-style-type: none"> provide the current user with a complete current set of standing data for a metering point; and 	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on enquiries with the Metering Services team, and review of the Communication Rules and SLA, we noted that Horizon Power has the following controls to provide the current user with a complete current set of standing data for a metering point and advise whether there is a communications link for the metering point, as per the metering SLA on request.</p> <ul style="list-style-type: none"> As per Section 1.7, pg. 19 of communication rules, Horizon Power will provide the Standing data to Code participants on request. The Network Operator to send standing data to a Code participant, and the format of the standing data details for the following four processes 		

Obligation no.	Obligation reference	Obligation description	Observation and findings			
		<ul style="list-style-type: none"> advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request. 	<ul style="list-style-type: none"> Partial standing data (On Request) Full standing data (On Customer Transfer) Standing data (On Data Change) Full standing data (All) 	<p>However, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
399	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R	<p>Based on enquiries with the Metering Services team, and review of the Communication Rules and SLA, Horizon Power on request provides the user with bulk standing data as per the communication rules approved by ERA. There has been no request from user for bulk standing data, hence the compliance obligation is not rated, and testing could not be performed.</p>
400	Integrated Regional Licence, condition 4.1.1 Electricity Industry	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	Priority: 4	Control Adequacy: A	Compliance Rating: 1	<p>Through interviews with Metering Services Manager, Metering data management team lead and review of Metering SLA and Communication rules, if Horizon provides energy data to a user it also provides the date of the meter reading in accordance with the requirements specified.</p> <ul style="list-style-type: none"> Horizon Power provides Energy data to the users as per the SLA and communication rules. The list of documents include: <ul style="list-style-type: none"> Scheduled monthly Meter Reading

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Metering Code, clause 5.15		<ul style="list-style-type: none"> - Interval Energy Data (monthly) - Interval Energy Data (daily) • After the walkthrough of data transfer to the users, Horizon Power provides the aforementioned data on daily basis to the users as per SLA via SFTP server. <p>Therefore, Horizon Power has complied with this obligation.</p>		
401	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.16	If a user collects or receives energy data from a metering installation, then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services team, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
402	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services team, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	5.17(1)	agreement to do so for billing purposes or for the purpose of providing metering services to the customer.			
403	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager, Metering data management team lead and review of the Metrology procedures, Velocity Screenshots & Meter data excel, Horizon Power has implemented the following controls to provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure aligns with 10.7 of the Code of Conduct (Supply of Electricity to Small Use Customers) 2018; When there is a request for energy data from the customer, Horizon Power staffs obtain verifiable evidence of customer consent prior to providing data to a person requesting such data on behalf of that customer. Testing of one sample it was verified that when a person requested data on behalf of customers, appropriate consent was obtained from the customer prior to data being provided within the timeframes prescribed. The information was given to the nominated recipient as excel document via email. <p>Therefore, Horizon Power has complied with this obligation.</p>		
404	Integrated Regional Licence, condition	A network operator must comply with a direction under subclause 5.17A(1) within the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager, Metering data management team lead and review of Metrology procedure, Velocity Screenshots & Meter data excel, Horizon Power has</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry Metering Code, clause 5.17A(3)	timeframes prescribed.	<p>implemented following controls to provide the requested energy data within timeframe prescribed</p> <ul style="list-style-type: none"> Sections 3.1.9, 3.7.2 of Metrology Procedure aligns with 5.17A(3) of the code and Horizon Power provides energy data and standing data as requested by the customer with verifiable consent. When there is a request for energy data from the customer, Horizon Power staffs obtain verifiable evidence of customer consent prior to providing data to a person requesting such data on behalf of that customer. Testing of one sample it was verified that Horizon Power has provided the customer/customer's representative with the energy data and standing data within 10 days from the date of request. <p>Therefore, Horizon Power has complied with this obligation.</p>		
409	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Based on the SLA and Communication Rules, Horizon Power provides acknowledgement of receipt of any customer, site or address attributes from the user within the prescribed timeframes. Through interviews with the Metering Services team, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
411	Integrated Regional Licence, condition 4.1.1	A network operator must, by not later than 6 months after the date this Code applies to the network operator,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with Metering Services Manager and Metering data management team lead, review of documents Communication rules and Metering SLA, Horizon Power has referenced Energy data verification form in Section 1.8 of Communication rules and Service 8 in Metering SLA. The Form related to the obligation was developed in this way to simplify the process given the</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry Metering Code, clause 5.20(1)	develop, in accordance with the communication rules, an Energy Data Verification Request Form.	Government's desire for a light handed and low-cost regulatory environment. Communications Rules was approved by the ERA and full consultation was undertaken with all likely Users in the Covered Network. Therefore, Horizon Power has complied with this obligation.		
412	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services Manager and Metering data management team lead, review of documents Communication rules and Metering SLA, Horizon Power has referenced the process to verify the Energy data in Section 1.8 of Communication rules and details of the service is provided in Service of Metering SLA. The Form related to the obligation was developed in full consultation was undertaken with all likely Users with information prescribed in the code. Additionally, Communications Rules was approved by the ERA in November 2021. Therefore, Horizon Power has complied with this obligation.		
413	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.20(4)	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: <ul style="list-style-type: none"> subject to subclause 5.20(5), use reasonable endeavours to verify 	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Following interviews with the Metering Services Manager and Metering Data Management Team Lead, we noted that on request, Horizon Power uses reasonable endeavours to verify energy data, and informs the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed as per the Metering SLA and Communication rules. However, it was concluded that Horizon Power did not have any Code participants or users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		energy data; and <ul style="list-style-type: none"> inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed. 			
414	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Following interviews with the Metering Services Manager and Metering data management team lead, and review of Metrology procedure on request, Horizon Power will conduct a test or audit if Code Participant reasonably requests a test or audit of (i) the accuracy of the metering installation, (ii) the energy data from the metering installation, (iii) the standing data for the metering installation. However, it was concluded that Horizon Power did not have any Code participants or users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
415	Integrated Regional Licence, condition	A test or audit under subclause 5.21(1) is to be conducted in accordance with the	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Following interviews with the Metering Services Manager and Metering data management team lead, and review of Metrology procedure on request, Horizon Power will conduct a test or audit for		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry Metering Code, clause 5.21(4)	metrology procedure and the applicable service level agreement.	requests as per clause 5.21(1) in accordance with the metrology procedure and the applicable service level agreement. However, it was concluded that Horizon Power did not have any Code participants or users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
418	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Following interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Metering SLA, Horizon Power charges the user if user requests a reference service (metering), which requires the provision of one or more extended metering services to satisfy the eligibility criteria, Horizon Power will provide the extended metering service and the user will pay the fees set out in schedule 5 for that service in addition to any reference tariff payable as applicable service level agreement. However, it was concluded that Horizon Power did not have any Code participants or users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
419	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Following interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Metering SLA, Horizon Power has implemented following controls to include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code. <ul style="list-style-type: none"> Meteorology procedure states that, where a test or audit undertaken by Horizon Power reveals a non-compliance with the Code, Horizon Power will not charge the Code Participant for 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Code, clause 5.21(9)	Code.	<p>conducting the test or audit.</p> <ul style="list-style-type: none"> Service Level Agreement states that, if the User requests the following extended metering services and the test reveals that the meter that was the subject of the test does not comply with the requirements of the Code, the user is not liable to pay any Fees applicable to those extended metering services. <p>However, it was concluded that Horizon Power did not have any Code participants or users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
420	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.21(11)	<p>If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must:</p> <ul style="list-style-type: none"> advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and must restore the 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Metering SLA, Horizon Power has implemented following controls to ensure that if a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, Horizon Power (a) advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors (b) must restore the accuracy of the metering installation in accordance with the applicable service level agreement</p> <ul style="list-style-type: none"> If the accuracy of the metering installation does not comply with the requirements of the Code, the retailer must be advised as soon as practicable of the errors detected and the possible duration of the existence of errors and arrange for the accuracy of the metering installation to be restored in a time frame agreed with the retailer in accordance with the applicable service level agreement. On review of one sample, we noted that Horizon Power tested the CT of the power transformer of Alinta at Murdoch Drive and one of the CTs have failed the safety requirements. Horizon Power took it out of service, to make the installation accurate by upgrading the meter program. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		accuracy of the metering installation in accordance with the applicable service level agreement. ¹²	<p>The project to replace the CT took two years to replace the CT system.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
421	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager, it was noted that even when the meters are taken for calibration or accuracy testing or calibration, Horizon Power replaces the energy meter and testing is performed in-house. Under no circumstances, the original stored error correction data in a meter is altered.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
422	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Validation Rules (mData21- Horizon Power's metering database system) - Horizon Power, Validation Snapshots - mData21, Energy data estimation during audit period, Horizon Power has implemented following controls to ensure that energy data is validated in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.</p> <ul style="list-style-type: none"> It was observed that validation process is automated in mData21, and variation is flagged for manual intervention. Any meter data read and transferred into mData21 follows the below 		

Obligation no.	Obligation reference	Obligation description	Observation and findings					
		<p>minimum, the prescribed rules and procedures set out in Appendix 3.</p>	<p>process.</p> <ul style="list-style-type: none"> • Meter data read > Validation check (mData21 validation rules) > Flag variances > Metering Data Management Team > Process the validation checks > Action plan • Section 6: Metering Installation Types 1 - 5 - Validation of Metrology procedures sets out detail guidelines for Validation of Energy Data from Types 1-5 Metering Installations with Check Metering, with Partial Check and without Check Metering installations. • Section-7: Metering Installation Types 1-5 - Accumulation, Substitution and Estimation lays out the Requirement to Produce Substituted or Estimated Energy Data, Substitution and Estimation methods for Metering Installation Types 1-4, Type 5 with various applicable rules as per the metering code. • Section-8: Metering Installation Type 6 - Validation, Substitution and Estimation details out requirements, procedures, substitution and estimation methods as per metering code. • Verifying the process and procedures for validation supplemented by validation rules have been found to be consistent with the guidelines presented in Appendix-2, and the estimation rules meet the requirements specified in Appendix-3 of the metering code. <p>Therefore, Horizon Power has complied with this obligation.</p>					
423	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 5.22(2)</p>	<p>The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.</p>	<table border="1" data-bbox="775 951 2011 1023"> <tr> <td data-bbox="775 951 1122 1023">Priority: 4</td> <td data-bbox="1122 951 1462 1023">Control Adequacy: B</td> <td data-bbox="1462 951 2011 1023">Compliance Rating: 2</td> </tr> </table> <p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Validation Rules (mData21) - Horizon Power, Validation Snapshots - mData21, Energy data estimation during audit period, Horizon Power has implemented following controls to use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.</p> <ul style="list-style-type: none"> • It was observed that validation process is automated in mData21 and variation is flagged for manual intervention. Any meter data read and transferred into mData21 follows the below 			Priority: 4	Control Adequacy: B	Compliance Rating: 2
Priority: 4	Control Adequacy: B	Compliance Rating: 2						

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>process.</p> <ul style="list-style-type: none"> • Meter data read > Validation check (mData21 validation rules) > Flag variances > Metering Data Management Team > Process the validation checks > Action plan • Section 6: Metering Installation Types 1 - 5 - Validation of Metrology procedures sets out detail guidelines for Validation of Energy Data from Types 1-5 Metering Installations with Check Metering, with Partial Check Metering installations. • The read comparison of registered reads and pulses (interval read - a reading tool within), if that is less than 1% then validation with check meters. Type 2 - partial check metering • Verifying the validation rules and list of check meters installed, it was observed that Horizon Power has installed six check meters for major customer accounts. However, there is no process implemented to use check metering data to validate energy data of revenue metering installations and enhance the quality and reliability of the energy data. We acknowledge that there are other validation protocols configured within metering database platform (i.e. mData21) to confirm reliability of the revenue meter data. <p>Based on our testing, it was observed that there is no process to validate the revenue meter data with check meter data.</p>		
424	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Data substitution - Check Meter, Horizon Power has implemented following controls to substitute energy data where the data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	5.22(3)	prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.	<ul style="list-style-type: none"> Metrology Procedure section 7.5 details out different types of substitution methods Horizon Power uses in case of non-availability of actual energy meter data (Substitution method 11 - 18 for meter types 1-4 , Substitution Method 51 - 56 for meter type 5). Data Substitution - Check Meter gives the procedure to change the meter reading data from actual meter to check meter During sample testing, where the check meters installed were of same accuracy class of revenue meters and because of the unavailability of revenue energy meter data, customer is billed on check meter value. <p>Therefore, Horizon Power has complied with this obligation.</p>		
425	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Metering Services Manager and Metering data management team lead, it was observed that the Code participants were not affected of the loss or error during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
426	Integrated Regional Licence, condition	Substitution or estimation of energy data is required when energy data is missing,	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Substitution evidence (Estimate Type 62), Horizon Power has		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	4.1.1 Electricity Industry Metering Code, clause 5.22(5)	unavailable or corrupted, including in the circumstances described in this subclause.	<p>implemented following controls to substitute or estimate the energy data when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.</p> <ul style="list-style-type: none"> • Metrology Procedure <ul style="list-style-type: none"> • Section 3.5 calls out the possible situations where substitution or estimation of energy data will be carried out. • Section 7.5 and 8 details out the process of substitution or estimation • With the validation rules and estimation rules embedded in the mData21 automatically validates the energy data and flag instances which could not be validated due to skip reads. Estimation is carried out in accordance with the rules and formulae outlined in the metrology procedure (Metering Code 2012). • On testing one sample during the audit period, substitution of energy data has been done in mdata21 with Estimation type - 62 <p>Therefore, Horizon Power has complied with this obligation.</p>		
427	Integrated	A network operator must	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings			
	Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.22(6)	review all validation failures before undertaking any substitution.	<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Validation failure samples, Horizon Power has implemented following controls to review all validation failures before undertaking any substitution.</p> <ul style="list-style-type: none"> Section 3.4.5 details the process followed by Horizon Power in reviewing the energy data validation failure. Horizon Power review the validation failures to determine the cause of any apparently lost or erroneous energy data. Validation of energy data happens automatically in the mData21. If the validation could not be conducted, instances are flagged for review. Validation failure instances occurs mostly because of the skip read situations (no meter read) On testing one sample, it was observed that all the validations occur in mData21 and validation failure instances are flagged for manual approval after which the estimation/substitution is initiated <p>Therefore, Horizon Power has complied with this obligation.</p>			
428	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: yellow; text-align: center;">Priority: 4</td> <td style="background-color: green; text-align: center;">Control Adequacy: A</td> <td style="background-color: green; text-align: center;">Compliance Rating: 1</td> </tr> </table> <p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Estimation samples, Horizon Power has implemented following controls to designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.</p> <ul style="list-style-type: none"> As per Metrology Procedure, <ul style="list-style-type: none"> Section 3.5 details out the situations in which Horizon Power uses estimated or deemed actual value for the metering point. Section 7.5 (Type 1-4), 7.6 (Type 5), 8.4 (Type 6) details about various types of estimations undertaken by Horizon Power for energy data substitution through Substitution/estimation methods (11-18, 51-56, 61-65 respectively). The process of estimation involves identifying applicability of methods from 11-18, 51-56, 61 - 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
Priority: 4	Control Adequacy: A	Compliance Rating: 1				

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<p>65 for Type 1-4, Type 5, Type 6 respectively. The estimation is performed in accordance with the Appendix 3 of the code.</p> <ul style="list-style-type: none"> On sample testing, it was observed that Horizon Power designates an estimated or substituted value for the metering point to be a deemed actual value for the metering point if there is no possibility of determining the actual value through the methods defined in the metrology procedure. <p>Therefore, Horizon Power has complied with this obligation.</p>		
429	<p>Integrated Regional Licence, condition 4.1.1</p> <p>Electricity Industry Metering Code, clause 5.23(3)</p>	<p>If a network operator has designated a deemed actual value for a metering point then the network operator must:</p> <ul style="list-style-type: none"> repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and subclauses 5.24(3)(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed 	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Field inspection samples, Horizon Power has implemented following controls as per the metering code clause 5.23(3).</p> <ul style="list-style-type: none"> Section 3.5 of metrology procedure details out the situations in which Horizon Power uses estimated or deemed actual value for the metering point. The process of estimation of unavailable meter data, metering service team sends a field operator to inspect the metering installation and a service order request is raised to change the meter if the inspection report recommends changing the meter. On testing one sample, it was observed that on field visit, the operator has updated the metering team with the actual value. This was communicated to the billing team for updating the bill before sent to the customer. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		actual value.			
430	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Substitution instance, Horizon Power has implemented following controls to comply with metering code clause 5.24(1).</p> <ul style="list-style-type: none"> It was observed that during meter data validation, if energy data for a metering point, and a better quality actual or deemed actual value is available (second value), Horizon Power replaces the value with deemed accurate value. On testing one sample, there was no meter read available and Horizon Power has estimated a value during the billing time. A Service Order was released after the customer request to read the meter. Communication device fault was discovered, and they have updated the actual value. <p>Therefore, Horizon Power has complied with this obligation.</p>		
431	Integrated Regional Licence, condition 4.1.1 Electricity	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering data management team lead, it was noted that whenever there is a better-quality data comes through, the deemed actual value will be replaced with the better-quality value.</p> <p>However, there was no relevant activity during the audit period, hence the control testing could not</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Metering Code, clause 5.24(2)	actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	be performed and cannot be rated for compliance.		
432	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering data management team lead, it was noted that whenever there is a better-quality data comes through, the substituted value will be replaced with the better-quality value.</p> <p>However, there was no relevant activity during the audit period, hence the control testing could not be performed and cannot be rated for compliance.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
433	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Metering Services Manager and Metering data management lead, it was noted that Horizon Power will consider any reasonable request from a Code participant for an estimated or substituted value to be replaced.</p> <p>However, there was no relevant activity during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
434	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager and metering data management team lead, and review of Metrology Procedure, Substitution instance (Estimate 62), Horizon Power has implemented following controls to ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</p> <ul style="list-style-type: none"> Metrology procedure has defined clear guidelines for meter data validation, Energy data replacement/estimation/substitution, Horizon Power acts with all possible endeavours collects, validates and estimate the data as per good industry practices and guidelines defined in "ELECTRICITY INDUSTRY (METERING) CODE 2012". During the sample testing it was observed that Meter not communicating, there was no consumption history for same time last year (Estimation Method 61) so the system automatically uses Substitution Method for same time last period (Substitution method 62). <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
447	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 6.1(1)	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager, and review of Service Level Agreement, Communication rules, Metrology procedure, Service Level Agreement, Mandatory link criteria, horizon power in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.</p> <ul style="list-style-type: none"> • Service Level Agreement provides a detailed agreement between the code participant, network user for various metering, accuracy, fees, provisions, and other miscellaneous requirements • Communication rules define the rules apply to Code participants as defined by the Metering Code. It defines the methods and protocols, change control management procedures and documents, dispute resolution, technical services. • The purpose of this Metrology Procedure is to provide guidance to the responsible person on the correct provision, installation, and maintenance of metering installations in line with the principles of the Code, to interested third parties on the requirements for metering within the Horizon Power Networks. • Mandatory Link Criteria provides guidelines for the networking systems in the metering installations in accordance with the metering code and goes hand in hand with Metrology Procedure. <p>Therefore, Horizon Power has complied with this obligation.</p>		
448A	Integrated Regional Licence, condition 4.1.1 Electricity Industry	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager, and review of Service Level Agreement, Communication rules, Metrology procedure, Service Level Agreement, Mandatory link criteria, mail communication between Horizon Power and ERA, Horizon Power has submitted to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).</p> <ul style="list-style-type: none"> • Metrology Procedure was developed in 2006 and recent update was released after ERA approval on 28 December 2017. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Metering Code, clause 6.2	documents in subclauses 6.2(a)-(d).	<ul style="list-style-type: none"> Mandatory Link Criteria was developed in 10 April 2017 and became operational from 28 December 2017 after ERA approval. Based on the mail communication between ERA & Horizon Power, Metering Service Level Agreement was approved by ERA on 1 November 2021 and published on 30 November 2021. <p>Therefore, Horizon Power has complied with this obligation.</p>		
448B	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Metering Services Manager, and review of Service Level Agreement, Communication rules, Metrology procedure, Service Level Agreement, Mandatory link criteria, mail evidence, Horizon Power publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.</p> <ul style="list-style-type: none"> Metrology Procedure was developed in 2006 and recent update was released after ERA approval on 28 December 2017. Mandatory Link Criteria was developed in 10 April 2017 and became operational from 28 December 2017 after ERA approval. Based on the mail communication between ERA & Horizon Power, Metering Service Level Agreement was approved by ERA to be published on 30 November 2021. <p>Therefore, Horizon Power has complied with this obligation.</p>		
448C	Integrated Regional Licence, condition 4.1.1 Electricity Industry	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Manger Metering Services, review of communication rules and mail confirmation, it was observed that first version of communication rules were defined on 1 June 2021. After internal approvals, first draft of the communication rules document was submitted on 6 July 2021 for ERA approval. After revision, first approved version of communication rules was made available for use from 25 November 2021.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Metering Code, clause 6.19A(1)		Therefore, Horizon Power has complied with this obligation.		
448D	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Manger Metering Services, review of communication rules and mail confirmation, It was observed that first version of communication rules were defined on 1 June 2021. After internal approvals, first draft of the communication rules document was submitted on 6 July 2021 for ERA approval. After revision, first approved version of communication rules was made available for use from 25 November 2021.</p> <p>However, there was no amendments during the audit period, hence the control testing could not be performed and cannot be rated for compliance.</p>		
449	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Manger Metering Services, it was observed that on 13 September 2021, Horizon Power submitted a proposed model service level agreement to the Economic Regulation Authority for approval. The application was made under clause 6.2 of the Electricity Industry (Metering) Code 2012. In response to queries raised by the ERA, Horizon Power submitted a revised proposed model service level agreement to the ERA on 22 November 2021. The ERA is satisfied that Horizon Power has complied with the requirements of the Code. Accordingly, the ERA has decided to approve the revised proposed model service level agreement. Subsequently the document was published in Horizon Power website on 30 November 2021 with link https://www.horizonpower.com.au/globalassets/media/documents/manuals-</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			standards/metering/horizon-power-metering-services-service-level-agreement-november-2021.pdf. Therefore, Horizon Power has complied with this obligation.		
450	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through interviews with the Manger Metering Services, it was observed that on 13 September 2021, Horizon Power submitted a proposed model service level agreement to the Economic Regulation Authority for approval. The application was made under clause 6.2 of the Electricity Industry (Metering) Code 2012. In response to queries raised by the ERA, Horizon Power submitted a revised proposed model service level agreement to the ERA on 22 November 2021. The ERA is satisfied that Horizon Power has complied with the requirements of the Code. Accordingly, the ERA has decided to approve the revised proposed model service level agreement. Subsequently the document was published in Horizon Power website on 30 November 2021 with link https://www.horizonpower.com.au/globalassets/media/documents/manuals-standards/metering/horizon-power-metering-services-service-level-agreement-november-2021.pdf . Therefore, Horizon Power has complied with this obligation.		
452	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through our interviews with the Retail Operations Manager, we were informed that Horizon Power is aware of the obligation to notify Code participants of any change in their contact details when required. Based on confirmation from Retail Operations Manager, it was noted that Horizon Power had not updated its contact details during the audit period and hance HP was not required to notify each Code participant of its initial contact details and of any change to its contact details at least 3		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	7.2(2)		<p>business days before the change takes effect.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
457	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 8.1(1)	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Customer Service and Community Senior Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, another retailer, generator, metering data agent, user, or the AEMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. Through interviews, it was noted that:</p> <ul style="list-style-type: none"> • There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; and • It was confirmed that there were no disputes made between a licensed generator or the AEMO and Horizon Power during the audit period. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
458	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Customer Service and Community Senior Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, another retailer, generator, metering data agent, user, or the AEMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. Through interviews, it was noted that:</p> <ul style="list-style-type: none"> • There were no other relevant network operators, retailers, metering data agents or users on 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	8.1(2)	officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	<p>Horizon Power's networks during the audit period; and</p> <ul style="list-style-type: none"> It was confirmed that there were no disputes made between a licensed generator or the AEMO and Horizon Power during the audit period. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
459	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Customer Service and Community Senior Manager, we noted for the purpose of the Metering Code, "disputes" refers to metering disputes between Horizon Power as the network operator, another retailer, generator, metering data agent, user, or the AEMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. Through interviews, it was noted that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; and It was confirmed that there were no disputes made between a licensed generator or the AEMO and Horizon Power during the audit period. <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
460	Integrated Regional Licence, condition 4.1.1 Electricity	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Customer Service and Community Senior Manager, we noted for the purpose of the Metering Code, disputes refers to metering disputes between Horizon Power as the network operator, another retailer, generator, metering data agent, user, or the AEMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry Metering Code, clause 8.1(4)	prepare a written and signed record of the resolution and adhere to the resolution.	Transfer Code. Through interviews, it was noted that: <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; and It was confirmed that there were no disputes made between a licensed generator or the AEMO and Horizon Power during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
461	Integrated Regional Licence, condition 4.1.1 Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	Priority: 5	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Customer Service and Community Senior Manager, we noted for the purpose of the Metering Code, disputes refers to metering disputes between Horizon Power as the network operator, another retailer, generator, metering data agent, user, or the AEMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. Through interviews, it was noted that: <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; and It was confirmed that there were no disputes made between a licensed generator or the AEMO and Horizon Power during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
462	Integrated Regional Licence, condition 4.1.1 Electricity	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			Based on process walkthroughs with the Asset Services and Operations team, and review of the network operations documentation, such as Network Planning Guidelines, Technical Rules, Potential Neutral Problems Report, Power Quality Handbook and Manual it was noted that Horizon Power has implemented processes to maintain and monitor Horizon Power's power quality supply aligned to the standards prescribed by the Electricity Industry (Network Quality and Reliability of Supply) Code.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	with prescribed standards.	<p>Specifically, these include:</p> <ul style="list-style-type: none"> • Horizon Power maintains a set of Technical Rules consistent with the requirements in the NQRS. The Technical Rules outline required standards in relation to voltage and flicker, and define power quality testing requirements for new projects. • Horizon Power designs its systems and manages new connections to ensure compliance with the power quality standards. • Horizon Power includes flicker and harmonics in its suite of studies when planning for new projects and connections. • Horizon Power sets flicker and harmonics emission allocations for new connections to its power systems to ensure compliance with the Technical Rules. • Per the Power Quality Handbook, Horizon Power responds to complaints and other issues identified on its systems. <p>Based on our testing procedures, it was confirmed that Horizon Power maintains appropriate power quality standards and monitors the network performance so far as reasonably practicable. Therefore, Horizon Power has complied with this obligation.</p>		
463	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	Priority: 5	Control Adequacy: B	Compliance Rating: 1
			<p>Based on process walkthroughs with the Asset Services and Operations team, and review of the network operations documentation, such as Network Planning Guidelines, Technical Rules, Potential Neutral Problems Report, Power Quality Handbook and Manual it was noted that Horizon Power has implemented processes to maintain and monitor Horizon Power's power quality supply aligned to the standards prescribed by the Electricity Industry (Network Quality and Reliability of Supply) Code. Specifically, these include:</p> <ul style="list-style-type: none"> • Horizon Power maintains a set of Technical Rules consistent with the requirements in the NQRS. The Technical Rules outline required standards in relation to voltage and flicker, and define power quality testing requirements for new projects. • Horizon Power designs its systems and manages new connections to ensure compliance with the power quality standards. 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> Horizon Power includes flicker and harmonics in its suite of studies when planning for new projects and connections. Horizon Power sets flicker and harmonics emission allocations for new connections to its power systems to ensure compliance with the Technical Rules. Per the Power Quality Handbook, Horizon Power responds to complaints and other issues identified on its systems. <p>We were further advised that Horizon Power regularly monitors harmonics and flicker as part of:</p> <ul style="list-style-type: none"> Power quality audits; New Horizon Power project commissioning activities; New Independent Power Producer project commissioning activities; Customer LV EG system behind the meter system commissioning activities; Various trials and tests; Monitoring voltage fluctuations through the Potential Neutral Problems report; and Monitoring in response to customer complaints. <p>Based on our testing procedures, it was confirmed that Horizon Power maintains appropriate power quality standards and monitors the network performance so far as reasonably practicable. Management is assessing the newer version of AMI meters, which can measure power quality to monitor Harmonics. Therefore, Horizon Power has complied with this obligation with minor improvements to their generally adequate control environment.</p>		
464	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained, and the occurrence and duration of interruptions is kept to a minimum.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Following interviews with the Senior Manager System & Network Planning, Principal Planning Engineer, Senior Manager Asset Services, and review of the Network Performance Reports (2020-21 and 2021-22), Technical Rules, NQRS Audit Reports (2017-18 to 2019-20), Horizon power has implemented the following controls to confirm that the supply of electricity is maintained, and the occurrence and duration of interruptions is kept to a minimum.</p> <ul style="list-style-type: none"> Horizon Power discloses the evaluated CAIDI (Customer Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), SAIDI (System Average Interruption Duration Index) at different operational points across the regions and disclose the annual values 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Supply) Code, clause 9		<p>in the report. Horizon Power takes adequate steps from the design stages to reduce the occurrence and duration of the interruption to customer as a part of contingency analysis. Supply interruptions to customers are monitored and recorded for internal analysis and used to calculate:</p> <ul style="list-style-type: none"> - CAIDI - measures the duration of a power outage a customer is expected to have - SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period - SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. <ul style="list-style-type: none"> • The Technical Rules is the guiding document for maintaining the power supply and quality to the Horizon Power customers, which sets out: <ul style="list-style-type: none"> ○ the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. ○ power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. <p>Therefore, Horizon Power has complied with this obligation.</p>		
465	Integrated Regional Licence, condition 4.1.1 Electricity Industry	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			<p>Following interviews with the Senior Manager System & Network Planning, Principal Planning Engineer, Senior Manager Asset Services, and review of the Network Performance Reports (2020-21 and 2021-22), Technical Rules, NQRS Audit Reports (2017-18 to 2019-20), Horizon power has implemented the following controls to confirm that the supply of electricity is maintained, and the occurrence and duration of interruptions is kept to a minimum.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	(Network Quality and Reliability of Supply) Code, clause 10(1)		<ul style="list-style-type: none"> • Horizon Power discloses the evaluated CAIDI (Customer Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), SAIDI (System Average Interruption Duration Index) at different operational points across the regions and disclose the annual values in the report. Horizon Power takes adequate steps from the design stages to reduce the occurrence and duration of the interruption to customer as a part of contingency analysis. Supply interruptions to customers are monitored and recorded for internal analysis and used to calculate: <ul style="list-style-type: none"> - CAIDI - measures the duration of a power outage a customer is expected to have - SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period - SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. • The Technical Rules is the guiding document for maintaining the power supply and quality to the Horizon Power customers, which sets out: <ul style="list-style-type: none"> ○ the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. ○ power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. <p>Therefore, Horizon Power has complied with this obligation.</p>		
466	Integrated Regional Licence, condition	A distributor or transmitter must consider whether, in specified circumstances,	Priority: 5	Control Adequacy: A	Compliance Rating: 1
			Horizon Power has implemented a number of procedures including the Network and Generation Planning Guidelines, Power Quality guidelines and Switching Procedures to manage consistent		

Obligation no.	Obligation reference	Obligation description	Observation and findings								
	4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	<p>supply of electricity and consider alternative means to a customer who will be affected by a proposed interruption. These include:</p> <ul style="list-style-type: none"> • Horizon Power annually forecasts network interruptions, and manages the power system and network to keep the customers energised with existing lines, parallel operations and switching protocols . • Horizon Power discloses the evaluated CAIDI (Customer Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), SAIDI (System Average Interruption Duration Index) at different operational points across the regions and disclose the annual values in the report. Horizon Power takes adequate steps from the design stages to reduce the occurrence and duration of the interruption to customer as a part of contingency analysis. Supply interruptions to customers are monitored and recorded for internal analysis and used to calculate: <ul style="list-style-type: none"> - CAIDI - measures the duration of a power outage a customer is expected to have - SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period - SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. <p>Based on enquiries with the System & Network Planning and System Operations team and examination of documents for one sample planned outage, we confirmed that Horizon Power has complied with this obligation.</p>								
467	Integrated Regional Licence, condition 4.1.1 Electricity	In the event of a significant interruption to a small use customer, a distributor must either: <ul style="list-style-type: none"> • remedy the cause(s) of interruption so 	<table border="1"> <tr> <td data-bbox="775 1114 1122 1185">Priority: 4</td> <td data-bbox="1122 1114 1462 1185">Control Adequacy: A</td> <td data-bbox="1462 1114 2011 1185">Compliance Rating: 1</td> </tr> <tr> <td colspan="3" data-bbox="775 1185 2011 1369">Horizon Power has implemented a number of procedures including the Network and Generation Planning Guidelines, Power Quality guidelines and Switching Procedures to manage consistent supply of electricity and consider alternative means to a customer who will be affected by a proposed interruption. These include:</td> </tr> </table>			Priority: 4	Control Adequacy: A	Compliance Rating: 1	Horizon Power has implemented a number of procedures including the Network and Generation Planning Guidelines, Power Quality guidelines and Switching Procedures to manage consistent supply of electricity and consider alternative means to a customer who will be affected by a proposed interruption. These include:		
Priority: 4	Control Adequacy: A	Compliance Rating: 1									
Horizon Power has implemented a number of procedures including the Network and Generation Planning Guidelines, Power Quality guidelines and Switching Procedures to manage consistent supply of electricity and consider alternative means to a customer who will be affected by a proposed interruption. These include:											

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry (Network Quality and Reliability of Supply) Code, clause 12(3)	<p>that the prescribed standard is met; or</p> <ul style="list-style-type: none"> enter into an alternative arrangement to the customer's satisfaction for the supply of electricity. 	<ul style="list-style-type: none"> Horizon Power annually forecasts network interruptions, and manages the power system and network to keep the customers energised with existing lines, parallel operations and switching protocols . Horizon Power discloses the evaluated CAIDI (Customer Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), SAIDI (System Average Interruption Duration Index) at different operational points across the regions and disclose the annual values in the report. Horizon Power takes adequate steps from the design stages to reduce the occurrence and duration of the interruption to customer as a part of contingency analysis. Supply interruptions to customers are monitored and recorded for internal analysis and used to calculate: <ul style="list-style-type: none"> CAIDI - measures the duration of a power outage a customer is expected to have SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. <p>Based on enquiries with the System & Network Planning and System Operations team and examination of documents for one sample planned outage, we confirmed that Horizon Power has complied with this obligation.</p>		
468	Integrated	A distributor or	Priority: 5	Control Adequacy: A	Compliance Rating: 1

	<p>Regional Licence, condition 4.1.1</p> <p>Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)</p>	<p>transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.</p>	<p>Following interviews with the Senior Manager System & Network Planning, Principal Planning Engineer, Senior Manager Asset Services, and review of the Network Performance Reports (2020-21 and 2021-22), Technical Rules, NQRS Audit Reports (2017-18 to 2019-20), Horizon power has implemented the following controls to confirm that the supply of electricity is maintained, and the occurrence and duration of interruptions is kept to a minimum.</p> <ul style="list-style-type: none"> • Horizon Power discloses the evaluated CAIDI (Customer Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), SAIDI (System Average Interruption Duration Index) at different operational points across the regions and disclose the annual values in the report. Horizon Power takes adequate steps from the design stages to reduce the occurrence and duration of the interruption to customer as a part of contingency analysis. Supply interruptions to customers are monitored and recorded for internal analysis and used to calculate: <ul style="list-style-type: none"> - CAIDI - measures the duration of a power outage a customer is expected to have - SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period - SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. • The Technical Rules is the guiding document for maintaining the power supply and quality to the Horizon Power customers, which sets out: <ul style="list-style-type: none"> ○ the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. ○ power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. <p>Therefore, Horizon Power has complied with this obligation.</p>		
469	Integrated	The average total length	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings
	<p>Regional Licence, condition 4.1.1</p> <p>Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)</p>	<p>of interruptions of supply is to be calculated using the specified method.</p>	<p>Through interviews with the Senior Manager Asset Services and Data Management Officer - Engineering and Project Delivery and review of the Asset Management Strategy, Technical Rules, Operations Performance - Power BI Dashboard, NQRS Performance Reports (for 2020-21 and 2021-22), NQRS Working Sheets, it was observed that Horizon Power has following controls to calculate the average total length of interruptions of supply</p> <ul style="list-style-type: none"> • Horizon Power takes adequate care in monitoring and maintaining electrical power supply quality. Horizon Power's Technical Rules document provides a comprehensive framework for ensuring high service quality and performance standards in relation to the network. These rules encompass the technical requirements for the design and operation of equipment connected to the transmission and distribution systems, and are aligned with good industry practices, relevant laws, and statutory instruments. Specifically, the Technical Rules include power system performance standards that address flickers, voltage fluctuations, harmonic distortion, and the connection of large distorting loads, as defined in AS/NZS 61000.2001 for electromagnetic compatibility. • Supply interruptions to customers are monitored and recorded in NDS for analysis, used to calculate following metrics: <ul style="list-style-type: none"> - CAIDI - measures the duration of a power outage a customer is expected to have - SAIDI - measures the total number of minutes a customer is expected to have no power over a 12-month period - SAIFI - measures the total number of outages a customer is expected to experience over the 12-month period. • These indices are reported annually in the NQRS Performance Reports. To prepare these indices, Customer Affected (CA), Customer Interruption Minutes (CIM), Customer Served (CS) are extracted with SQL (Structured Query Language) from Horizon Power's data warehouse and used in calculating CAIDI, SAIDI, SAIFI. <p>Therefore, Horizon Power has complied with this obligation.</p>

Obligation no.	Obligation reference	Obligation description	Observation and findings		
470	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through interviews with the Retail Operations Manager, it was concluded that Horizon Power had not been issued an instrument by the Minister during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
471	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through our interviews with the Retail Operations Manager, Horizon Power is aware of notifying and agreeing with customers on the advantages and disadvantages of excluding or modifying provisions.		
			Through interviews with the Retail Operations Manager, we were informed that there were no instances where Horizon Power agreed with a customer to modify any provisions in their electricity supply during the audit period, and hence compliance requirement of agreeing in writing that a provision of this Part is excluded or modified in relation to the supply of electricity by the transmitter or distributor to the customer is not applicable during the review period.		
			Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
472	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			<p>Through interviews with the Retail Operations Manager, we were informed that service payments are required if notice for the planned interruption was not provided at least 72 hours' notice prior to a planned interruption.</p> <p>The Extended Outage Payment Scheme Process outlines the eligibility criteria and steps necessary to process customer applications for reliability payments. CSRs validate claims made against system recorded outages/faults at the supply address.</p> <p>If a claim is validated, payments are credited directly to a customer's account to ensure that the 30 day timeframe is met, and subsequently a customer can request a refund via EFT.</p> <p>Based on confirmation of the Retail Operations Manager, we noted that no such service standard payments were made for during the audit period.</p> <p>Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>		
473	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code,	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	Priority: 2	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and sample testing of five customer service payments, we noted Horizon Power has controls in place to confirm that payments are made to a customer within the specified time frame if a supply interruption exceeds 12 hours as per the clause 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code. Customers can submit a claim online via the Horizon Power website, or by submitting a hardcopy claim form.</p> <p>Once applications are received, Horizon Power will advise the relevant depot to investigate the details of the outage in question and assess whether it exceeded 12 hours. Once reviewed and approved, Horizon Power automatically credits the customer's account. The customer may then</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	clause 19		request a refund via EFT or leave their account in credit. Therefore, Horizon Power has complied with this obligation.		
474	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19.</p> <p>On review of Horizon Power Horizon Power's website Make a claim section, and the Customer charter, we noted that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> • Unless it is an emergency, Horizon Power will give at least three working days (i.e. 72 hours) notice before planned interruptions and committed to compensating you \$20 in the event of any delay • Horizon Power is committed for the payment of \$120 under the Extended Outage Payment Scheme (EOPS), if any customer has affected by a power interruption of longer than 12 consecutive hours. • How the application can be made; and • The way the application will be dealt with by Horizon Power <p>Therefore, Horizon Power has complied with this obligation.</p>		
475	Integrated Regional Licence, condition 4.1.1 Electricity Industry	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19.</p> <p>On review of Horizon Power Horizon Power's website Make a claim section, and the Customer</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	(Network Quality and Reliability of Supply) Code, clause 21(2)	in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	<p>charter, we noted that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> • Unless it is an emergency, Horizon Power will give at least three working days (i.e. 72 Hrs)' notice before planned interruptions and committed to compensating you \$20 in the event of any delay • Horizon Power is committed for the payment if \$120 under the Extended Outage Payment Scheme (EOPS), if any customer has affected by a power interruption of longer than 12 consecutive hours. • How the application can be made; and • The way the application will be dealt with by Horizon Power <p>Also, annual written notices are provided to the customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
476	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19.</p> <p>On review of Horizon Power Horizon Power's website make a claim section, and the Customer charter, we noted that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> • Unless it is an emergency, Horizon Power will give at least three working days (i.e. 72 Hrs)' notice before planned interruptions and committed to compensating you \$20 in the event of any delay • Horizon Power is committed for the payment if \$120 under the Extended Outage Payment Scheme (EOPS), if any customer has affected by a power interruption of longer than 12 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
		year.	<p>consecutive hours.</p> <ul style="list-style-type: none"> • How the application can be made; and • The way the application will be dealt with by Horizon Power <p>Also, annual written notices are provided to the customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
477	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	Priority: 5	Control Adequacy: B	Compliance Rating: 1
<p>Through interviews with Senior Manager System Operations and Operations Control Centre Manager, Metering Services Manager and review of Power On Advantage, and SCADA (Supervisory Control and Data Acquisition) system walkthrough, it was noted that Horizon Power has following controls to monitor the operation of its network to ensure compliance with specified requirements.</p> <ul style="list-style-type: none"> • Walkthrough of Horizon Power’s SCADA noted that SCADA covers all Horizon Power locations, including main sites or depots, sub stations, power stations and repeater sites. All the instances in the Horizon Power network are stored in the SCADA system. A Trouble Call system associated with the SCADA system helps HPCC team with any of the service interruptions from voltage, system fault, service interruptions, voltage fluctuations and ground faults. • We were further advised that Horizon Power regularly monitors harmonics and flicker as part of: <ul style="list-style-type: none"> ○ Power quality audits; ○ New Horizon Power project commissioning activities; ○ New Independent Power Producer project commissioning activities; ○ Customer LV EG system behind the meter system commissioning activities; ○ Various trials and tests; ○ Monitoring voltage fluctuations through the Potential Neutral Problems report; and 					

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> Monitoring in response to customer complaints. <p>Based on our testing procedures, it was confirmed that Horizon Power maintains appropriate power quality standards and monitors the network performance so far as reasonably practicable. Management is assessing the newer version of AMI meters, which can measure power quality to monitor Harmonics. Therefore, Horizon Power has complied with this obligation with minor improvements to their generally adequate control environment.</p>		
478	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the System Operations, System Network Performance and Asset Services team, we noted that the network performance and operations related data is stored within PowerOn Advantage, Trouble Call System, SCADA and CS16 (Data Management System) for the specified period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>		
479	Integrated	A distributor or	Priority: 4	Control Adequacy: A	Compliance Rating: 1

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	<p>Through interviews with the System Operations, System Network Performance and Asset Services team, we noted that Horizon Power has established Power Quality Investigation Handbook and Manual to perform power quality investigations. These investigation practices are aligned to the requirements of this obligation.</p> <p>Our sample testing of one investigation confirmed that the investigation was completed within 20 working days and reported to the customer concerned. Therefore, Horizon Power has complied with this obligation.</p>		
480	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Manager Asset Services and review of documents, we noted Horizon Power has controls in place to perform power quality investigations, as outlined within the Power Quality Investigation Handbook and Manual. On review of the Power Quality Investigation Handbook, we noted the following:</p> <ul style="list-style-type: none"> • In the instance an investigation finds there to be a network fault, the Regional Customer Relations contacts the Customer to explain power quality investigation status and proposed course of action. The customer will also be advised of their responsibilities (e.g. access to property) with regards to this investigation. • In the instance an investigation finds there to be no network fault, the 'Regional Customer Relations advises the Customer verbally and in writing that a full investigation has been carried out but has failed to identify any faults with Horizon Power equipment. <p>Our sample testing of one investigation confirmed that the investigation was completed within 20 working days and reported to the customer concerned. Therefore, Horizon Power has complied with</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			this obligation.		
481	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(2)	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small use customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power directs customers who are seeking information that will assist them in utilising the complaints handling process to the Horizon Power website or the Customer Charter complying the requirement of clause 25(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code.</p> <p>Through review of Customer Charter and website, we noted that it provides information regarding Horizon Power's complaints handling processes. The Horizon Power website and the Customer Charter are available to all customers at no charge.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
482	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through review of a customer charter, it was noted that Horizon Power has documented process wherein if a customer is not satisfied with a complaint, then he has right to refer the electricity ombudsman under the Act Part 7 complying with requirement of clause 25(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code. The Customer Charter is available to all customers on Horizon Power Website at no charge.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
483	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(1) and (2)	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>As per the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. In September 2020, Qualeng performed the independent audit to monitor Horizon Power's compliance against the Code.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
483A.	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(3) and (4)	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>As per the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. In September 2020, Qualeng (Engineering consulting firm) performed the independent audit to monitor Horizon Power's compliance against the Code.</p> <p>On review of an email trail from Horizon Power to the Minister, noted that the 2020 NQRS Independent Performance Report was provided to the Minister and the ERA on 17 September 2020. Further review of an email trail to the ERA shows the NQRS (Network Quality and Reliability of Supply) report was provided on 23 September 2020 and was due to be published on Horizon Power's external website by 1 October 2020.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			Therefore, Horizon Power has complied with this obligation.		
483B.	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>As per the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. In September 2020, Qualeng performed the independent audit to monitor Horizon Power's compliance against the Code. On review of an email trail from Horizon Power to the Minister, we noted that the 2020 NQRS Independent Performance Report was provided to the Minister and the ERA on 17 September 2020. On further review of an email trail to the ERA shows the NQRS report was provided on 23 September and was due to be published on Horizon Power's external website by 1 October 2020.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
484	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Our review of the NQRS Performance Report(s) and a covering letter to the Minister noted that the reports were prepared and published in compliance with Electricity Industry (Network Quality and Reliability of Supply) Code 2005 covering the following:</p> <ul style="list-style-type: none"> • Audit Requirements • Stand-alone Power Systems (SPS) • Voltage Fluctuations and Harmonics • Number of breaches of each provision of the Code • Remedial action taken for each provision • Significant interruptions to small use customers • Total number of complaints received • Number of customer complaints in each discrete area 		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
			<ul style="list-style-type: none"> Total amount spent addressing Power Quality and Reliability complaints Payments to customers for failure to meet certain standards Average Length of Interruption of Supply to Customer Premises in Minutes Average Number of Interruptions of Supply to Customer Premises Average Percentage of Time that Electricity has been Supplied to Customer Premises Average Total Length of All Interruptions of Supply to Customer Premises in Minutes <p>Therefore, Horizon Power has complied with this obligation.</p>		
485	Integrated Regional Licence, condition 4.1.1 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Our review of the NQRS Performance Report(s) and a covering letter to the Minister noted that the reports are prepared in compliance with the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Based on enquiries and sample testing of one NQRS Performance Report, we confirmed that Horizon Power's 'Government Relations Advisor' shared the NQRS Performance Report to the Minister on 21 September 2022 (i.e. before 7 days of its publication).</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
486	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.1	The licensee must submit to the Coordinator a draft renewable source electricity contract by the time specified in the Act or by the	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager and review of documents submitted to the coordinator, we noted Horizon Power had submitted a draft renewable source contract to the Coordinator of Energy in Sept 2020 as per the Regulation 8 of Electricity Industry (Licence Conditions) Regulations. Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Electricity Industry (Licence Conditions) Regulations, regulation 8	Coordinator.			
487	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.6 Electricity Industry (Licence Conditions) Regulations, regulation 8	The licensee must comply with a direction by the Coordinator to submit an amendment to the renewable source electricity contract by the time specified.	Priority: 4	Control Adequacy: N/P	Compliance Rating: N/R
			Through enquiries with the Retail Operations Manager, we noted Horizon Power was not directed by the Coordinator to submit an amendment to the draft renewable contract during the audit period. Horizon Power's current renewable contract is available on their website at no cost. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.		
488	Horizon Power Integrated Regional Licence, Schedule 1, condition 3.1 and 3.2 Electricity	The licensee must offer to purchase renewable source electricity from a renewable source electricity customer under an approved renewable source electricity contract.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			Through enquiries with the Retail Operations Manager, we noted that Horizon Power offers to purchase a customer's excess renewable energy that has been exported into the electricity system. During the move-in process, Velocity will automatically identify customers eligible for the buyback offer and customers are asked if they agree to terms and conditions over the phone. Additionally, Velocity provides CSRs call scripts on offering to purchase electricity from a customer. Information on the DEBS (Distributed Energy Buy Back Scheme) can be found on Horizon Power's		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	Industry (Licence Conditions) Regulations, regulation 6		<p>website and is sent to eligible customers as part of their acknowledgement email and welcome letter.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
489	Horizon Power Integrated Regional Licence, Schedule 1, condition 3.3 Electricity Industry (Licence Conditions) Regulations, regulation 7	The licensee must submit to the Coordinator a written report detailing the amount of renewable source electricity purchased by the licensee and the cost of purchasing that renewable source electricity as soon as practicable at the end of each financial year.	Priority: 4	Control Adequacy: C	Compliance Rating: 2
			<p>Horizon Power is required to report the amount of renewable source electricity purchased and cost of purchasing distributed under approved contracts after the end of each financial year to the coordinator (EPWA- Energy Policy WA).</p> <p>Through interviews with the Customer Service and Community Senior Manager we noted that the annual report covering the above-mentioned details as per regulation 7 of the Electricity Industry (Licence Conditions) Regulations, was not submitted and could not be provided for the purpose of compliance testing.</p> <p>Based on interviews and review of documents, it was concluded that Horizon Power has inadequate controls with significant improvement needed, however due to the source data not being saved at the time of compiling the report, compliance testing could not be performed.</p>		
496	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry	Subject to specified exceptions, the licensee must offer to supply electricity under a standard form contract to a customer who requests it.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Retail Operations Manager, we noted Horizon Power offers to supply under a SFC to any customer that requests it, providing the premises is connected to a distribution system.</p> <p>Further, Horizon Power has stopped offering non-standard contract from July 2021 onwards. The Customers are able to obtain a copy of the Horizon Power's SFC on the Horizon Power website. The SFC includes Horizon Power's offer to supply electricity.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
	(Customer Contracts) Regulations, regulation 40		Therefore, Horizon Power has complied with this obligation.		
497	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(a)	The licensee must have a stand-alone power system engagement strategy that complies with the requirements under sub regulation 10(3).	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Horizon power has developed a Standalone Power System (SPS) engagement strategy which outlines the following information that are aligned to the requirements of regulation 10(3):</p> <ul style="list-style-type: none"> • set out protocols for engagement with customers and potential customers; • set out protocols for engagement and coordination with retailers who sell, or propose to sell, electricity through SPS; • set out the following information for customers and potential customers in relation to the provision of SPS: <ul style="list-style-type: none"> ○ the basic specifications of the SPS available; ○ a description of the process of installing an SPS and of the services to be provided by it; ○ a description of a customer's obligations in relation to an installed SPS; and ○ a description of a customer's consumer rights in relation to the provision of an SPS and the services provided by it. • set out indicative costs for upgrading an installed SPS; • set out the contact details of the following: <ul style="list-style-type: none"> ○ the corporation's customer and fault services; ○ the electricity ombudsman (as defined in section 92(1) of the Electricity Corporations Act 2005 (the Act); and ○ the corporation. <p>Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
498	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(b)	The licensee must comply with the stand-alone power system engagement strategy in relation to the provision of stand-alone power systems to eligible customers.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Horizon Power’s SPS engagement strategy outlines the process to engage eligible customers and install SPS. In particular, the provision of SPS to eligible customers includes:</p> <ul style="list-style-type: none"> • Performing energy audits and site inspection to better understand power usage of a site to design a SPS solution that is tailored to the specific requirements of the site and finalise a SPS design; • Signing up of customers which guarantees the same level of service, reliability and the same tariff customers previously received while connected to the overhead network; and • Installation of SPS based on the safety and reliability standards outlined in the SPS engagement strategy. <p>Our sample testing of one SPS installation instance and examination of relevant documentation confirmed that Horizon Power has complied with obligation during the audit period.</p>		
499	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(c)	The licensee must have the initial stand-alone power system engagement strategy endorsed by the Minister.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Asset Services and SPS team and examination of the SPS Strategy, we confirmed that the SPS engagement strategy was signed and endorsed by the Minister on 5 May 2022. Therefore, Horizon Power has complied with this obligation.</p>		

Obligation no.	Obligation reference	Obligation description	Observation and findings		
500	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(d)	The licensee must review the stand-alone power system engagement strategy at least every two years.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Asset Services and SPS team, and examination of the SPS engagement strategy, we confirmed that Horizon power has planned to review the SPS Strategy once at least in every two years. The next review of the SPS Strategy is due by April 2024.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		
501	Horizon Power Integrated Regional Licence, condition 4.1.1 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(e)	The licensee must ensure that the current version of the stand-alone power system engagement strategy is publicly available on a website maintained by the licensee.	Priority: 4	Control Adequacy: A	Compliance Rating: 1
			<p>Through interviews with the Asset Services and SPS team and review of the Horizon Power's website information, we confirmed that Horizon power has published the SPS engagement strategy on their website, which is current and updated version of their strategy document as well as available in a downloadable format and ready to use.</p> <p>Therefore, Horizon Power has complied with this obligation.</p>		

Appendices

A. Audit Priority Rating Scale

Table A.1: Audit Priority Rating Scale

		Preliminary Adequacy of Existing Controls		
		Weak	Medium	Strong
Inherent Risk	High	Priority 1	Priority 2	
	Medium	Priority 3	Priority 4	
	Low	Priority 5		

Table A.2: Sample testing guide

Audit Priority Rating	Example Audit Procedures
1	<ul style="list-style-type: none"> Controls testing and extensive substantive sample testing of activities and/or transactions. Follow-up and re-test matters previously reported (if any).
2	<ul style="list-style-type: none"> Controls testing and moderate substantive sample testing of activities and/or transactions Follow-up and re-test matters previously reported (if any).
3	<ul style="list-style-type: none"> Controls testing with limited sample size. Further substantive testing of transactions only if further control weakness found. Follow-up and re-test of matters previously reported (if any).
4	<ul style="list-style-type: none"> Confirmation of existing controls via observation and walk-through testing. Follow-up of matters previously reported.
5	<ul style="list-style-type: none"> Confirmation of existing controls via observation, discussions with key staff and reliance on key references & process walkthrough (desktop review).

B. Horizon Power stakeholders who participated in the Audit

No.	Business Area	Name of Process Owners	Position of Process Owners
1	Customer and Community	David Frankel	Senior Manager Customer Service & Community
		Troy Mulder	Retail Operations Manager
2	Metering Services	Jeff Campbell	Senior Manager Technology Shared Service
		Greg Will	Metering Services Manager
		Kathleen Temby	Metering Data Management Team Lead
3	Data Management	Suresh Parimi	Senior Manager Digital & Data Transformation

		Deep Chopra	Data Management & Integration Manager
4	Asset Services	Steve Lillis	Senior Manager Asset Services
		Hilton Bennie	Asset Services Delivery Manager
		Andy Neemann	Asset Systems Manager
		Gerard Chow	Data Management Officer
5	System & Network Planning	Andy Kondola	Senior Manager System & Network Planning
		David Stephens	Principal Planning Engineer
6	System Operations	Max Maxwell	Senior Manager System Operations
		Paul Maccan	Operations Control Centre Manager
7	Risk and Audit	Liang Tay	Risk & Audit Manager
		Prachi Goel	Risk & Audit Specialist

C. List of key documentation examined

Sr No.	List of Documents
1	Standard and Non-Standard Contract templates including terms and conditions
2	Annual Compliance and Performance reports for 2020, 2021 and 2022
3	<p>Work instructions, policies and procedures for the following processes:</p> <ul style="list-style-type: none"> • Connection • Disconnection • Payment difficulty and financial hardship • Life support • Meteorology • Meter replacement • Meter installation • Meter inspection • Communication rules • Mandatory link criteria • Technical Rules • Revenue Electricity Meters Specification • Meter Testing • Must read process • Automated Meter reading process • Asset Management Policy • Underground Distribution System (UDS) Manual • Western Australian Service and Installation Requirements (WASIR) • Switching Operators Manual - Transmission • Switching Operators Manual - Distribution • Customer complaints • Bill review • New connections • Family violence
4	Consolidated Annual Financial Report for 2020, 2021 and 2022
5	Post-audit implementation plan progress report

Sr No.	List of Documents
6	Computershare service level agreement document
7	Financial Hardship Procedure
8	Horizon Power EIRL2 Reporting Datasheets 2020, 2021 and 2022
9	List of new connections, disconnections, and reconnections
10	Population transaction details from 1 April 2020 to 31 March 2023 for the following: <ul style="list-style-type: none"> • New connections and disconnections • Customer complaints • Customer master data • Metering database
11	Horizon Power - Crisis & Emergency Management Plan
12	Horizon Power's Asset Management Strategy document
13	Power Quality Investigation Handbook and Manual
14	Crisis and Emergency Management Plan
15	Stand-alone power system engagement strategy
16	Horizon Power Metering Services - Service Level Agreement (Metering Service Level Agreement)
17	Network Quality & Reliability - Working Sheet
18	Esperance District Contingency Plan
19	Operations Master Priority Restoration Feeders
20	List of life support customers
21	List of pre-payment customers
23	List of payment difficulty and hardship customers
24	Sample of customer bills
25	Sample of reminder notices and disconnection notices

D. Work Schedule

The following diagram depicts the work schedule and timeline for the Audit fieldwork and reporting activities.

Audit Phase	Key Activities	2023 (week commencing)															
		April				May					June				July		
		3	10	17	24	1	8	15	22	29	5	12	19	26	3	10	17
Fieldwork																	
1	Perform process walkthroughs and interviews			✓													
2	Perform sample testing and assessment procedures				✓	✓											
Reporting																	
3	Validate audit observations with management						✓										
4	Discuss recommendations							✓									

Audit Phase	Key Activities	2023 (week commencing)															
		April				May					June				July		
		3	10	17	24	1	8	15	22	29	5	12	19	26	3	10	17
5	Preparation and submission of Draft Audit Report to management								✓	✓							
6	Submission of the Draft Audit Report to the ERA										✓						
7	Addressing ERA's feedback and finalising the Audit Report											✓	✓				
8	Submission of the Final Audit Report to the ERA																✓

E. EY audit team and effort profile

Team member	Position and Role	Total hours
Michael Rundus	Partner, Quality Review and Signing	5
Bradley Hooper	Partner, Delivery Partner	15
Isabella Cheong	Director, Quality Assurance	30
Nabendu Sharma	Senior Manager, Fieldwork Lead	150
Rahul Kamodiya	Manager, Fieldwork Support	210
Prabhu Kiran	Senior Consultant, Fieldwork Support	250
Emma Crisp	Consultant, Fieldwork Support	250
Total		910

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