

2023 – Post Audit Implementation Plan



Manual Ref. / Year	Non-Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditors' Recommendation	Management Action
01/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation – 87 <i>Electricity Industry (Customer Contracts) Regulations (2005), regulation 13</i> 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. Details: 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>Horizon Power's MyPower product was discontinued in July 2021. Grandfathering arrangements are in place for customer contracts established prior to the date of discontinuation.</p> <p>Regulation 13 (2) (and Code of Conduct clause 10.1(3)) requires that Horizon Power give or make available tariff information to a customer on request, in writing, at no charge and within 8 business days. Regulation 13 does not require the process Horizon Power follows to comply with this obligation to be set out within a customer contract.</p> <p>Section 17 of Horizon Power's MyPower non-standard contract includes instructions for customers wishing to obtain information; and Page 2 of the contract sets out the methods customers can use to</p>

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			<p>contact Horizon Power for information.</p> <p>In accordance with Code of Conduct clause 10.1 (1), Horizon Power gives notice of variations to tariffs, fees and charges, annually to each of its grandfathered customers on the MyPower product.</p> <p>As the MyPower product has been discontinued, Horizon Power does not intend to amend existing non-standard contracts to include information on how it publishes variations to price information.</p> <p>Responsible Person: Senior Manager Customer Solutions</p> <p>Due Date: No further action is proposed.</p>
02/2023	<p>Non-Compliance Rating: B/2</p> <p>Compliance Obligation – 90 <i>Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(1A), 16(2) and 34</i> 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-</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</p>	<p>Horizon Power's MyPower product was discontinued in July 2021. Grandfathering arrangements are in place for customer contracts established prior to the date of discontinuation.</p> <p>Section 21 of Horizon Power's MyPower non-standard contract includes details of when amendments to the contract may be</p>

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	<p>standard contract must require the retailer to notify the customer of any amendment to the contract.</p> <p>Details: 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>requirements for approval and the way the amendment will be published, per the Electricity Industry (Customer Contracts) Regulations (2005), regulations 16(2).</p>	<p>made; and details of how notices will be communicated to customers.</p> <p>As the MyPower product has been discontinued, Horizon Power does not intend to amend existing non-standard contracts to include additional information on how amendments will be processed.</p> <p>Responsible Person: Senior Manager Customer Solutions</p> <p>Due Date: No further action is proposed.</p>
03/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation – 98B <i>Electricity Industry (Customer Contracts) Regulations (2005), regulation 34B</i> A non-standard contract for residential customer must not state that the residential customer is required to pay a security deposit.</p> <p>Details: 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>	<p>Horizon Power's MyPower product was discontinued in July 2021. Grandfathering arrangements are in place for customer contracts established prior to the date of discontinuation.</p> <p>Existing MyPower customers have not and will not be requested to provide a security deposit.</p> <p>As the MyPower product has been discontinued, Horizon Power does not intend to amend its MyPower non-standard contracts to remove the clause relating to security deposits.</p>

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			<p>Responsible Person: Senior Manager Customer Solutions</p> <p>Due Date: No further action is proposed.</p>
<p>04/2023/ 1/2020</p>	<p>Non-Compliance Rating: C/2 Compliance Obligation – 124 <i>Integrated Regional Licence, condition 4.5.1</i> 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 Act. 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 to provide an audit trail to verify the accuracy and completeness of the Annual Performance Reports.</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>	<p>Horizon Power will review and incorporate the Auditors recommendations Horizon Power in preparing the 2022/23 reporting datasheets and noting and recording source data as required. Horizon power will provide to ERA a plan outlining what source data that will be retained for fields within the datasheets that require source data for ERA review.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: Oct 2023</p>
<p>07/2023/ 3/2020</p>	<p>Non-Compliance Rating: B/2 Compliance Obligation – 209 <i>Code of Conduct (2018), clause 6.3 (1) (a) / Code of Conduct (2022), clause 41 (1)</i> 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. Details: Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual</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 and payment plans for</p>	<p>Under the Code of Conduct (2022) Horizon Power satisfy the obligations of the code by making additional time to pay and payment plans available to customers facing payment difficulties. This change in the code was initiated by Horizon Power to reflect the needs circumstances of customers facing hardship.</p>

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	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.	those customers experiencing payment difficulties. This requirement should also be added to relevant call scripts.	<p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: No further action is proposed.</p>
08/2023/ 4/2020	<p>Non-Compliance Rating: B/2 Compliance Obligation - 211 <i>Code of Conduct (2018), Clause 6.4 (1) (a) / Code of Conduct (2022), Clause 41 (1) (a)</i> A retailer must offer the residential customer additional time to pay a bill. Details: 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.</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>Under the Code of Conduct (2022) Horizon Power satisfy the obligations of the code by making additional time to pay and payment plans available to customers facing payment difficulties. This change in the code was initiated by Horizon Power to reflect the needs of customers facing hardship.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: No further action is proposed.</p>
09/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 214 <i>Code of Conduct (2018), clause 6.4 (3) / Code of Conduct (2022), clause 43 (5)</i> 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. Details: Through enquiries with the Retail Operations Manager and review of the payment arrangement letters shared with customers, we noted Horizon Power provides customers</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>Horizon Power will review and incorporate the Auditors recommendations. Implementation of recommendations are to be scoped and included in program of works to meet noncompliance.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: March 2024</p>

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	<p>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.</p>		
10/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 218 <i>Code of Conduct (2018), clause 6.8/ Code of Conduct (2022), clause 45 (3)</i> A retailer must advise a customer experiencing financial hardship of the information specified in subclause 45(3). Details: 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> <ul style="list-style-type: none"> • customer's right to have a bill redirected to a different address (including an email address) at no charge; • payment methods available to the customer; and • concessions that may be available to the customer and how to access them; and • different types of tariffs that may be available to the customer; • independent financial counselling services and relevant consumer representatives available to assist the customer; and 	<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> <ul style="list-style-type: none"> • customer's right to have a bill redirected to a different address (including an email address) at no charge • payment methods available to the customer • concessions that may be available to the customer and how to access them; • different types of tariffs that may be available to the customer; • independent financial counselling services and relevant consumer representatives available to assist the customer; and • availability of any other financial assistance offered by the 	<p>Horizon Power will review and incorporate the Auditors recommendations. Implementation of recommendations are to be scoped and included in program of works to meet noncompliance. Ability to record phone calls for Hardship customers is currently in progress with implementation scheduled for January 2024. Call scripts are being updated with implementation scheduled for October 2023.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: March 2024</p>

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	<ul style="list-style-type: none"> availability of any other financial assistance offered by the retailer, and how to access this assistance. 	<p>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>	
12/2023	<p>Non-Compliance Rating: B/4 Compliance Obligation - 238 <i>Code of Conduct (2018), clause 7.7(4)</i> 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). Details: 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 	<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 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 the data quality. Focus on longer-term system solutions to prevent non-compliance. 	<p>Horizon Power reviewed and implemented new processes for managing life support notifications and confirmations for planned outages in 2021. An external review confirmed the controls were appropriate and effective. Refresher training and quality checks are conducted on the outage notification process to ensure ongoing adherence and understanding. A project is currently funded and in progress to ensure accurate certification and recertification of life support customers, identification of customers affected by a planned outage and an autonomous notification and confirmation process.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: Current process requires no further action to meet compliance. Project to automate and improve process to meet obligations due June 2025</p>

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	<p>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>		
<p>13/2023/ 6/2020</p>	<p>Non-Compliance Rating: B/2 Compliance Obligation - 240 <i>Code of Conduct (2018), clause 7.7(6)/ Code of Conduct (2022), clause 85 (1)</i> 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). Details: 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>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>Horizon Power has implemented a process from January 2023 to request the annual confirmation and re-certification from existing and new life support customers every three years. 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. Horizon Power should continue to focus on the implementation of the process from 2023-24 onwards for compliance with the Code of Conduct covering the following: Horizon Power should examine the current life support customer listing to confirm 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 qualified medical practitioner confirming life support requirement; 	<p>As noted in the Auditors recommendations Horizon Power have reinstated the annual confirmation and recertification process. Horizon Power will review and implement improvements to meet the Auditors recommendations where identified.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: March 2024</p>

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		<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. • Additional control should also be implemented for a periodic review over the conduct of these confirmation processes to confirm compliance of the obligation. • In line with good practice, the returned forms should be retained electronically under the respective customer accounts for record keeping purposes. 	
14/2023	<p>Non-Compliance Rating: B/3 Compliance Obligation - 259B <i>Code of Conduct (2022), clause 60(3)</i> 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. Details:</p>	<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.</p>	<p>An internal and external review has been conducted to review and identify improvements to ensure customers are re-energised immediately upon payment. These recommendations included that operator certificates be added to Horizon Power's Configuration Management Database with renewal dates recorded and automated</p>

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	<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 recognize 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.</p>		<p>reminders set to trigger the required action as expiry of the certificate approaches.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: No further action required</p>
15/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 283A <i>Code of Conduct (2018), clause 10.8 (1) / Code of Conduct (2022), clause 75 (1)</i> A distributor must publish on its website the information detailed in subclause 75(1)(a) to (k). Details: 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>	<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 as per the Code of Conduct (2018 and 2022).</p>	<p>Horizon Power has updated the Horizon Power website in accordance with the Auditors recommendation.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: Complete</p>
16/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 299 <i>Code of Conduct (2018), clause 12.1 (2) / Code of Conduct (2022), clause 87 (2)</i> 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). Details:</p>	<p>Horizon Power should include the response process to customers on complaints in the Process Customer Complaint document.</p>	<p>Horizon Power will review the auditors' recommendations and implement the required changes to ensure compliance with the Code requirements for the resolution of Complaints and Disputes Implementation of recommendations are to be scoped and included in program of works to meet noncompliance.</p>

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	<p>The Process Customer Complaint document does not include details of the response process to customers in relation to complaints.</p>		<p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: March 2024</p>
17/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 299A <i>Code of Conduct (2018), clause 12.1/ Code of Conduct (2022), clause 87(3)</i> The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014. Details:</p> <p>The Process Customer Complaint document does not include the response process and has not been 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 	<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 	<p>Horizon Power in line with the Auditors recommendation will review the process Customer Complaint document against AS/NZS 10002:2014 and make any required adjustments. Implementation of recommendations are to be scoped and included in program of works to meet noncompliance.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: March 2024</p>
18/2023	<p>Non-Compliance Rating: B/2 Compliance Obligation - 307B <i>Code of Conduct (2022), clause 91(2)</i> The family violence policy must provide for the details as prescribed in subclauses 91(2)(a) to (j). Details:</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>Horizon Power will update the Family Violence policy, including call scripts to advise vulnerable customers about the consequences of being named on the account of a residential customer who is not vulnerable</p>

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	<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>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: September 2023</p>
<p>19/2023/ 8/2020</p>	<p>Non-Compliance Rating: A/2 Compliance Obligation – 319 <i>Electricity Industry Metering Code, clause 3.1</i> 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. Details: 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. These meters are progressively being changed as owner/tenants change.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 14 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>Metering Services will draft and seek approval of and complete a mail campaign to have these customers change their meters</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: December 2023</p>
<p>20/2023/ 9/2020</p>	<p>Non-Compliance Rating: A/2 Compliance Obligation – 326 <i>Electricity Industry Metering Code, clause 3.5 (1) and (2)</i> 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. Details: Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 14 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>Metering Services will draft and seek approval of and complete a mail campaign to have these customers change their meters</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: December 2023</p>

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	<p>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. These meters are progressively being changed as owner/tenants change.</p>		
<p>21/2023/ 10/2020</p>	<p>Non-Compliance Rating: A/2 Compliance Obligation - 327 <i>Electricity Industry Metering Code, clause 3.5(3)</i> 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. Details: 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. These meters are progressively being changed as owner/tenants change.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 14 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>Metering Services will draft and seek approval of and complete a mail campaign to have these customers change their meters</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: December 2023</p>
<p>22/2023/ 11/2020</p>	<p>Non-Compliance Rating: A/2 Compliance Obligation – 333 <i>Electricity Industry Metering Code, clause 3.9 (3)</i> 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. Details: Horizon Power self-identified this obligation as 'non-compliant' in their 2019-20, 2020-21 and 2021-22 Annual</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 14 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>Metering Services will draft and seek approval of and complete a mail campaign to have these customers change their meters</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: December 2023</p>

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Manual Ref. / Year	Non-Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditors' Recommendation	Management Action
	<p>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. These meters are progressively being changed as owner/tenants change.</p>		
<p>23/2023/ 12/2020</p>	<p>Non-Compliance Rating: A/2 Compliance Obligation - 341 <i>Electricity Industry Metering Code, clause 3.11A (2)</i> 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. Details: 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. These meters are progressively being changed as owner/tenants change.</p>	<p>Horizon Power should continue to take reasonable steps to try and replace the 14 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>Metering Services will draft and seek approval of and complete a mail campaign to have these customers change their meters</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: December 2023</p>
<p>24/2023</p>	<p>Non-Compliance Rating: B/2 Compliance Obligation – 423 <i>Electricity Industry Metering Code, clause 5.22(2)</i> 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. Details: During our testing we observed that Horizon Power has installed six (6) check meters for major customer accounts.</p>	<p>Horizon Power to 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>Deal with the changes required through the upgrade of the Meter Data Management System in the Retail Systems Transformation project.</p> <p>Responsible Person: Manager Metering Services</p> <p>Due Date: July 2025</p>

PROTECTED

Manual Ref. / Year	Non-Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Auditors' Recommendation	Management Action
	<p>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 other validation protocols configured within metering database platform (i.e. mData21) to confirm reliability of the revenue meter data.</p>		
25/2023	<p>Non-Compliance Rating: C/2 Compliance Obligation - 489 <i>Electricity Industry (Licence Conditions) Regulations, regulation 7</i> 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. Details: 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>Horizon Power experienced a change in structure and the departure of key personnel in 2021 resulting in the reporting obligation not being transferred. Obligations and responsibility to provide reporting has been defined and rectified.</p> <p>Responsible Person: Senior Manager Customer Service and Community</p> <p>Due Date: No further action required</p>