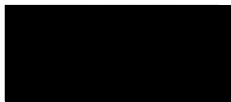





Performance Audit Report 2023 ERL20

Audit Report	Authorisation	Name	Position	Date
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GLOSSARY

AE	Amanda Energy
AEMO	Australian Energy Market Operator
■	Pricing Risk Model (Used in reference to the Proprietary System developed by the Licensee). It is an analytical program including automated Western Power portal data ordering.
BDM	Business Development Manager
CRM	Customer Relationship Management
CTR	Customer Transfer Request
ERL20	Retail Licence for Amanda Energy Pty Ltd
ERA	Economic Regulation Authority
ESA	Electricity Supply Agreement
ETAC	Electricity Transfer Access Contract
HubSpot	Cloud based CRM
LUC	Large Use Customer
NMI	National Meter Identifier
NSFC	Non Standard Form Contract
MW	Megawatt
SFC	Standard Form Contract
SUC	Small Use Customer
SWIS	South West Interconnected System
VC	Verifiable Consent
VCF	Verifiable Consent Form
WPN	Western Power Networks

This report was prepared by representatives of GES Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits were undertaken using a sampling process and the report and its recommendations were reflective only of activities and records sighted during this audit process. GES Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. The client had the opportunity for review to ensure no commercially sensitive information was disclosed.

1. EXECUTIVE SUMMARY

1.1 Auditors Qualified Opinion

We have undertaken a reasonable assurance engagement on Amanda Energy’s (the Licensee) compliance, in all material respects, with the Electricity Retail Licence (ERL20) (the Licence) and all applicable obligations from the applicable Electricity Compliance Reporting Manual released June 2020 (Licence Obligations) (together referred to as the “Licence Conditions”) for the period from 1 September 2021 to 31 August 2023. The assurance engagement was undertaken in accordance with the Economic Regulation Authority’s (ERA) 2019 Audit and Review Guidelines – Electricity and Gas Licences.

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described in Basis for Qualified Opinion, Amanda Energy has complied, in all material respects, with the Licence Conditions for the period from 1 September 2021 to 31 August 2023.

1.2 Basis for Qualified Opinion

With respect to the audit period 1 September 2021 to 31 August 2023, the Licensee demonstrated significant improvements in relation to compliance with its electricity retail licence since the 2021 Performance Audit. It was noted that non-compliances were largely identified during the current audit period by the Licensee increase awareness to legislative obligations and improved compliance processes. However, as a result of identified control inadequacies, Amanda Energy did not comply with the Licence Conditions as detailed below:

Table 1 - Summary of Non-Compliances Performance Audit 2023

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
29*Δ	<p>Electricity Industry Customer Transfer Code, CI 4.7</p> <p>A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.</p>	<p>01/2023: The Licensee's control procedures were improved following the 2021 Performance Audit, and this was demonstrated with the revision of the control procedure, internal audits identifying the non-compliances, recording in the compliance breach register and the development of the Min Lead Timeframe Calculator).</p> <p>Additional, non-compliances were identified during the 2023 audit period and subsequently lead to the Licensee developing an excel spreadsheet for further process control (refer 175.1 - Min Lead Timeframe Calculator (2022 - 2024)). It is the auditor’s opinion that the current control processes are adequate to ensure ongoing compliance with requirements of obligation 29. Compliance was noted for the period 9 December 2022</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
		to 31 August 2023. There are no further recommendations in relation to obligation 29.
87*	<p>Electricity Industry (Customer Contracts) Regulations, Reg 13</p> <p>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 prices information.</p>	<p>02/2023: The Licensee updated their non-standard form contracts effective 21/02/2023, ensuring compliance with this clause 13(2)13(2)(a) and (b) of the Electricity Industry (Customer Contracts) Regulations 2005 as amended. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p>
89*Δ	<p>Electricity Industry (Customer Contracts) Regulations, Reg 15</p> <p>A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.</p>	<p>03/2023: The Licensee updated their non-standard form contracts effective 8/10/2021, ensuring compliance with this regulation. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p>
90*Δ	<p>Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34</p> <p>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.</p> <p>The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p>	<p>04/2023: The Licensee updated their non-standard form contracts throughout the audit period to reflect the requirements of regulation 16 and it was confirmed that the Licensee was compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) and (2) for the applicable period effective from 8/10/2021 to 01/01/2023; and • Regulation 16(1) (1A) from 21/02/2023 to 31/8/2023. <p>It was noted that the Licensee was non-compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) (1A) for the period 01/01/2023 to 20/02/23. This was due to the requirements of amendment regulations not being incorporated into the NSFC until 21/02/2023. • Regulation 34 was non-compliant for the applicable period effective from 01/01/2023 to 31/8/2023, as the changes made to the contracts were not communicated to the customers as required, <p>Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p> <p>It was noted compliance with regulation 16 for the SFC was applicable to the full audit period. Refer recommendation 04/2023 for corrective action.</p>
98A	<p>Electricity Industry (Customer Contracts) Regulations, Reg 34A</p> <p>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</p>	<p>05/2023: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34A of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
	<p>the retailer will provide the notification in the manner specified.</p>	<p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 19.2) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>
98C	<p>Electricity Industry (Customer Contracts) Regulations, Reg 34C</p> <p>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.</p>	<p>06/2023: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34C of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 20) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>
105	<p>Economic Reg Authority (Licensing Funding) Regs 2014</p> <p>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p>	<p>07/2023: The Licensee confirmed that during the audit period, Amanda Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in March 2022 relating to standing data charges that was paid 1 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The Office & Finance Manager confirmed the controls in relation payments, i.e., corporate outlook calendar. The non-compliance was administrative and had not material effect on customers or third parties. As such, no recommendation is made.</p>
124	<p>Retail Licence, condition 4.4.1</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 the Electricity Industry Act.</p>	<p>08/2023: Whilst it was noted that the Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved. The requirement to ensure the accuracy of non-compliance reporting to the ERA still required some improvements to the control environment and the monitoring of the controls. As such, to ensure ongoing compliance, the Licensee should further improve:</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
		<ul style="list-style-type: none"> • the updates to controls established required from changes in legislative requirements, such as the Internal Compliance Manual, Life Support Register, etc • the formalisation of the internal audit compliance frameworks as related to legislative updates and with consideration of the future reporting requirements. • the capacity of the internal resources responsible to ensure compliance with the requirements of the electricity retail licence.
133	<p>2022 Code of Conduct, CI 10(2) 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.</p>	<p>09/2023: The Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved.</p> <p>Compliance was confirmed during the site audit (i.e., the ESA NSFC Notification detailing the differences between AE's NSFC and SFC). There are no further recommendations made.</p>
299	<p>2022 Code of Conduct, CI 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).</p>	<p>10/2023: The Licensee confirmed that for the duration of the audit period, 17/3/2022 to 31/8/2023, Amanda Energy's internal process for handling complaints and resolving disputes complied with AS ISO 10002-2014, specifically, the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA (Refer 302).</p> <p>Non-compliance was noted during the previous audit and the Licensee developed a PAIP in response to recommendation 16/2021. Amanda Energy was non-compliant for the period 1/9/2021 to 16/3/2022 when the deficiencies in the control procedures were addressed.</p> <p>The control procedures were revised, and it was noted the Complaint Handling procedure specifically detailed how Amanda Energy would handle complaints about the retailer, electricity marketing agents or marketing. There are no further recommendations made.</p>
302	<p>2018 Code of Conduct, CI 12.2 - A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.</p>	<p>11/2023: The Licensee confirmed that for the duration of the audit period applicable, (i.e., 17/3/2022 to 20/2/2023) Amanda Energy complied with the Customer Complaint Guidelines – October 2016 approved by the ERA.</p> <p>Non-compliance was noted during the previous audit and the Licensee developed a PAIP in response to recommendation 17/2021. Amanda Energy was non-compliant for the period 1/9/2021 to 16/3/2022 when the deficiencies in the control procedures were addressed.</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
		<p>The obligation to comply with the guideline particularly in reference to the requirement for the Licensee to differentiate customer queries from complaints was evidenced.</p> <p>Notably revisions to control processes were undertaken in relation to the wrongful disconnection, payment of service standard payment and distinguishing between a query and a complaint as defined by AS ISO 10002-2014.</p>
408	<p>Electricity Industry Metering Code, CI 5.19(3) Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.</p>	<p>12/2023: It was noted, during the period May to December 2022, on 3 occasions the Licensee did not update Customer Details Notification (CDN) within 1 business day as required.</p> <p>The Licensee has reviewed control processes and not further non-compliance have been noted. There are no further recommendations made.</p>

¹ The reference number allocated to the licence obligation in the Electricity or Gas Compliance Reporting Manual.

Table 2 - Audit Compliant and Control Rating Scales

Performance Audit Compliance & Controls Rating Scales			
Adequacy of Controls 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 impact on customers or third parties
C	Inadequate controls – significant improvement needed	3	Non-Compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

As required by the Audit Guidelines Section 5.1.6.1, Table 3 lists the number of licence obligations that were given each combination of compliance and controls ratings. The table allows licensees and the ERA to confirm the auditor has rated all relevant licence obligations and provides a simple summary of the licensee’s compliance during the audit period.

Table 3 - Compliance and Controls Ratings Summary Table

		COMPLIANCE RATING					
		1	2	3	4	N/R	TOTAL
CONTROLS RATING	A	16	9	0	0	5	30
	B	0	3	0	0	0	3
	C	0	0	0	0	0	0
	D	0	0	0	0	0	0
	N/P	116	0	0	0	87	203
	TOTAL	132	12	0	0	92	236

Note that, in accordance with the Audit Guidelines:

- Obligations assessed as being “not applicable” to Amanda Energy’s electricity retail licence activities have not been included within this report.
- A control rating is only provided for those obligations with a Priority 1, 2 or 3 rating, where an obligation is assessed as non-compliant, or where a control improvement opportunity is identified.

1.3 Basis of Audit

This electricity retail licence (**ERL20**) performance audit for Amanda Energy was conducted to assess the licensee's compliance with the conditions of its licence. The audit procedures were undertaken in alignment with ISO 31000 Risk Management – Guidelines, APES 110 Code of Ethics, ASAE 3000, ASAE 3100, ASA 315, ASA 500, ASA 530 and ASA750 (refer section 3.5).

This performance audit was conducted by the auditor within a reasonable assurance engagement framework, with the intent of providing an objective and professional compliance assessment.

This Performance Audit report is an accurate representation of the auditor's findings and opinions.

Amanda Energy's Responsibilities for Compliance with the "Licence Conditions"

Amanda Energy is responsible for:

- a) Compliance with the Licence as evaluated against the conditions within the Licence, for the period 1 September 2021 to 31 August 2023.
- b) Identifying risks that threaten the conditions within the Licence identified above being met.
- c) Identifying suitable compliance requirements as specified by the conditions within the Licence.
- d) Identifying, designing and implementing controls to enable the conditions within the Licence to be met and to monitor ongoing compliance.

Our Independence and Quality Control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are fundamentally based on confidentiality, integrity, objectivity, and independence, skills and competence. We applied quality management system controls as defined by ISO 9001 in undertaking this assurance engagement.

Assurance Practitioner's Responsibilities

Our responsibility is to express an opinion on Amanda Energy's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 September 2021 to 31 August 2023. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether Amanda Energy has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 September 2021 to 31 August 2023.

Inherent Limitations

Assurance engagements are subject to inherent limitations, together with the internal control structure, it is possible that misstatement, error or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement relating to the current audit period does not indicate compliance for future audit periods.

1.4 Appreciation

The Licensee, Amanda Energy Pty Ltd (**Amanda Energy**).

Amanda Energy is an energy supplier who provides services under an electricity retail licence (**ERL20**) granted by the Economic Regulation Authority. As a holder of an Electricity Retail Licence, Amanda Energy sells electricity to “contestable” customers in the South West Interconnected System (SWIS). A contestable customer is one who uses more than 50,000 kWh per year of electricity. Amanda Energy liaises directly with Western Power in order to facilitate meeting their consumers energy requirements.

As an electricity retailer Amanda Energy Pty Ltd liaises directly with consumers and ensures that their energy requirements are met. In general, through the use of a non-standard contract (**NSC**), the Licensee, supplies electricity to small use (**SUC**) to large use customers (**LUC**) and does not supply electricity to residential customers.

The organisation has an efficient organisational structure with approximately 8 employees and has notably engaged external expertise to improve compliance processes. During the audit period, as of June 30 annually, Amanda Energy reported as part of the Electricity Performance Reporting Datasheets, 166 business customers for 2021; 251 business customers for 2022 and more than 368 business customers for 2023.

The Licensee informed the auditor that on the 15/12/2022 the customers of CleanTech Energy Pty Ltd (trading as Delorean Energy Retail, ERL24) transferred to Amanda Energy.

Sections 13 of the Electricity Industry Act 2004 require as a condition of every retail licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a performance audit report by an independent expert acceptable to the Authority. Geographe Environmental Services (GES) has been approved by the Authority (Ref: D264223 Date: 9/8/2023) to undertake the works subject to an audit plan approved by the Authority.

This is Licensee’s fourth electricity retail licence performance audit to assess the Licensee’s level of compliance with its licence conditions.

The previous performance audit period was 1 September 2017 to 31 August 2021. A Performance Audit Report 2021 was submitted to the ERA for review and published on their website. As a result, the Economic Regulation Authority considered Amanda Energy needed to improve its compliance with its licence conditions. The ERA published a notice (28 January 2022) on the ERA website, detailing their decision to reduce the period covered by the current audit from 48 months to 24 months. As such the current audit period is 1 September 2021 to 31 August 2023.

The 2021 Performance Audit Report noted several obligations that were not applicable to the audit scope as at the time Amanda Energy did not have:

- small use customers on non-standard form contracts,
- residential customers
- non-contestable customers

The Audit Plan for the current audit period identified that there have been several changes in regard to Amanda Energy's electricity retail capabilities since the previous audit period. Specifically, the requirement to update the non-standard form contracts (NFSCs) for small use customers and subsequently action the applicable of the compliance obligations. Notably, Amanda Energy still does not supply residential and non-contestable customers.

2. PERFORMANCE AUDIT

The Licensee has issued a consultancy brief to undertake its fourth Performance Audit as required by its Electricity Retail Licence (ERL20). The Performance Audit Report is to be provided to the Economic Regulation Authority (ERA/the Authority) to assess the Licensee's level of compliance with the licence conditions. The Performance Audit was conducted in accordance with the 2019 Audit and Review Guidelines – Electricity and Gas Licences (Audit Guidelines).

2.1 Performance Audit Objectives

The objective of this Performance Audit was to assess the effectiveness of systems and processes developed and implemented by Amanda Energy to achieve the level of compliance as stipulated by its Electricity Retail Licence ERL20. Our qualified audit opinion provides indication that there were specific areas where the Licensee did not comply with the established criteria. This performance audit also intends provide recommendations for corrective action or an assessment of corrective action taken by the Licensee, where necessary.

The Audit Guidelines, section 1.5.1, required that the scope of the audit considered:

- *Process compliance* – the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- *Outcome compliance* – the actual performance against standards prescribed in the licence throughout the audit period.
- *Output compliance* – the existence of the output from systems and procedures throughout the audit period (specifically, proper records which provide assurance that procedures are consistently followed, and controls are maintained).
- *Integrity of reporting* – the completeness and accuracy of the compliance and performance reports provided to the ERA.
- Compliance with any individual licence conditions – the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.

As such, the recommendations were made in this performance audit report were directly linked to the specific findings and areas of non-compliance. These recommendations aim to address the root causes of the identified non-compliance issues and to guide the auditee on corrective actions to ensure future compliance and primarily related to enhancing the effectiveness of organisational Control Procedures as well implementing revised internal compliance processes, such as internal audit.

Opportunities for improvement identified that relate to the Performance Audit findings have been provided directly to the Licensee and have not been included in this document as required by the 2019

Audit and Review Guidelines – Electricity and Gas Licences section 5.1.8

As required by the Audit Guidelines (refer section 5.3) the licensee must submit a post-audit implementation plan, with the audit report. The PAIP must be a separate document and must be developed by the Licensee.

2.2 Performance Audit Scope

The Performance Audit is an audit of the effectiveness of measures taken by the licensee to meet the performance criteria specified in the Licence (refer Section 13(2) of the Electricity Act 2004). Performance criteria are defined within Condition 1 of the Licence as:

- The terms and conditions of the Licence
- Any other relevant matter in connection with the applicable legislation that the ERA determines should be part of the Performance Audit.

There was one version of ERL20 applicable to the audit period (version 4 – 1 July 2018 which is valid until expiry 8 August 2028). There were no areas of special focus prescribed by the ERA in relation Amanda Energy's Performance Audit.

As specified in the Electricity Compliance Reporting Manual (February 2023), externally imposed criteria under law or directives, as defined by ASAE3100, for Electricity Retail Licences, that supply electricity to small use customers, encompasses the following:

1. the following Legislation:
 - ◆ *Electricity Industry Act 2004*: Licence Conditions and Obligations (Appendix 1 - Section 12)
2. the following Regulations:
 - ◆ *Economic Regulation Authority (Licensing Funding) Regulations 2014*; and
 - ◆ *Electricity Industry (Customer Contracts) Regulations 2005 (Section 11)*.
 - ◆ Including the *Electricity Industry (Customer Contracts) Amendment Regulations 2022*
 - ◆ *Electricity Industry (Licence Conditions) Regulations 2005 (Appendix 1 - Section 13)*
3. the following Codes:
 - ◆ *Electricity Industry Customer Transfer Code 2016 (Appendix 1 - Section 9)*
 - ◆ *Code of Conduct for the Supply of Electricity to Small Use Customers 2022 (Section 14)*.
 - ◆ Including the *Code of Conduct for the Supply of Electricity to Small Use Customers 2018*
 - ◆ *Electricity Industry (Metering) Code 2012 (Appendix 1 - Section 15)*

4. the following regulatory guidelines and documentation:
 - ◆ 2019 Audit and Review Guidelines: Electricity and Gas Licences (Audit Guidelines)
 - ◆ Electricity Compliance Reporting Manual (refer below for detail of those applicable)
 - ◆ Electricity Compliance Reporting Manual June 2020
 - ◆ Electricity Compliance Reporting Manual February 2022
 - ◆ Electricity Compliance Reporting Manual January 2023
 - ◆ Electricity Compliance Reporting Manual February 2023
 - ◆ Customer Complaint Guidelines - December 2016
 - ◆ Compliance Enforcement Policy 2016
 - ◆ Financial Hardship Policy Guidelines - Electricity Licences
 - ◆ Electricity retail licence performance reporting datasheets
 - ◆ Any relevant regulatory guidance documentation published by the ERA or applicable regulatory authority, such as the Australian Energy Sector Cyber Security Framework (AESCSF)

5. the following enforceable undertakings:
 - ◆ 2023 Audit Plan as developed and approved by the ERA.
 - ◆ 2021 Performance Audit – ERL20

6. the following internally imposed criteria:
 - ◆ Policies
 - ◆ Manuals
 - ◆ Plans
 - ◆ Procedures
 - ◆ Work Instructions

A full list of the internally imposed criteria that were established by the and provided to the auditor as part of the document review and throughout the audit process Licensee are referenced in appendix 2. Consideration of internally imposed audit criteria has been referenced in the audit findings against each compliance obligation, refer appendix 1.

2.3 Performance Audit Excluded Conditions

There were some Electricity Compliance Reporting Manual – June 2020 obligations for ERL20 that have been excluded from the audit because they are not applicable to Amanda Energy. During the audit period Amanda Energy did not have small use customers on life support. All registered life support customers were large use customers. Excluded compliance obligations were detailed in the Audit Plan. Deviations from the Audit Plan are detailed in Section 1.3.

Table 4 - Obligations Excluded from the Audit Report

Electricity Compliance Reporting Manual Section	Obligation Reference ¹	Explanation for Obligations Not Applicable to Licensee's Operations
11. Electricity Industry (Customer Contracts) Regulations – Licence conditions and obligations		
<i>Electricity Industry (Customer Contracts) Regulations 2005 and Amendment Regulations 2022</i>	98B+	The Licensee does not have any residential customers.
12. Electricity Industry Act – Licence conditions and obligations		
Retail Licence, condition 6.7.1	110	The Licensee has not been designated under s71(1) of the Electricity Act as the supplier of last resort.
13. Electricity licences – Licence conditions and obligations		
Retail Licence, condition 5.2.4	120	Obligation 120 was inapplicable since Amanda Energy Pty Ltd was not assigned individual performance standards by the ERA during the audit period.
14. Code of Conduct – Licence conditions and obligations		
<i>Code of Conduct</i>	134, 273A+	Retail obligations only applicable to Synergy/Horizon.
<i>Code of Conduct</i>	136, 147, 193A+, 191-196, 200, 202-204, 204A+, 205-210, 211, 212, 212A+, 213, 213A+, 214, 214A-E+, 215-220, 222-223, 223A-B+, 225-227 231,279, 294-295	The Licensee does not have any residential customers.
<i>Code of Conduct</i>	246-271C <i>Note: 257 is Type 1</i>	
<i>Code of Conduct</i>	276-278	The Licensee does not have any non-contestable customers.
<i>Code of Conduct</i>	307A-G	Family Violence obligations are not applicable to the Licensee.
15. Electricity Industry Metering Code – Licence conditions and obligations		
<i>Metering Code</i>	354	Obligations only applicable to Synergy/Horizon.

Electricity Compliance Reporting Manual Section	Obligation Reference¹	Explanation for Obligations Not Applicable to Licensee's Operations
<i>Metering Code</i>	401, 405	Obligations only applicable to Network Operator.

* Electricity Compliance Reporting Manual – June 2020

The Retail Licence compliance elements that were included in the scope of this audit are as defined in Table 7 and are further detailed in Appendix 1.

2.4 Performance Audit Variation to Audit Plan

As required by section 5.1.4 of the Audit and Review Guidelines – 2019, the audit report must describe any deviations from the audit plan. Auditors must also identify any licence obligations that were assessed after the approval of the audit plan by the ERA, as ‘not applicable’. Licence obligations or effectiveness criteria that have been assessed as ‘not applicable’ should not be included in the performance summary or observations section of the report.

It was noted during the preparation of the performance audit report the following errors in the audit plan:

- i. Obligation 182 - 2022 Code of Conduct, CI 30(6) had been assigned audit priority 2 and should have been audit priority 4. This has been amended in Appendix 1.

Consequence	Likelihood	Inherent Risk	Control Assessment	Audit Priority
MODERATE	UNLIKELY	MEDIUM	MODERATE	4

2.5 Performance Audit Methodology

As required by the Audit Guidelines (refer section 5.1.2), this audit report must describe the methodology used to execute the audit plan. As such, the performance audit methodology, subject to the variations detailed in section (2.4), is detailed below:

1. **Document Review and Control Procedures Assessment:** We conducted a comprehensive review of control procedures and assessed the control environment. In cases where the Licensee's controls underwent changes or revisions during the audit period, we examined both the former and current controls. This includes a review of applicable versions of documents such as the Electricity Supply Agreement – Application and Commercial Terms and the Schedule to Electricity Supply Agreement: Standard Terms & Conditions (Appendix 2).
2. **Site Visit:** The site audit took place at Amanda Energy's offices on 13 October 2023. No other entity performed functions on behalf of the Licensee that required review. We evaluated various systems implemented by the Licensee to support its electricity retail business operations. There were also several follow up online meetings, telephone discussions and emails in relation the performance audit scope.
3. **Audit Procedures and Evidence:** Audit procedures and evidence collection were specified in the Audit Plan and aligned with the assigned Audit Priority for Licensee obligations. The Audit Priority, the non-compliance and the strength of the Licensee's control environment, (refer Table 8), guided the nature and extent of the applied audit procedures. Professional judgment was exercised to determine the sufficiency of audit evidence. In instances where control environment adequacy was identified as an issue, detailed audit procedures, including increased sampling and process re-evaluation, were performed to assess compliance levels.

Table 5 – Fieldwork, Control Categories and Descriptions

Controls	Description of Controls
Control Environment	The licensee’s management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology, training and the skills and experience of the relevant staff members.
Information System	The suitability of the licensee’s information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system.
Control Procedures	The presence of systems and procedures to monitor compliance with the licence and to detect or prevent instances of non-compliance or under-performance.
Compliance Attitude	The action taken by the licensee in response to any previous audit or review recommendations, and an assessment of the licensee’s attitude towards compliance.
Outcome Compliance	The actual performance against standards prescribed in the licence throughout the audit or review period.

4. **Audit Methodology Standards and Guidelines:** The Performance Audit was conducted following principles of ISO 9001, ISO 31000 Risk Management Guidelines, APES 110 Code of Ethics, and the following Standards on Assurance Engagement by the Auditing and Assurance Standards Board:
 - ASAE 3000 - Assurance Engagements Other than Audits or Reviews of Historical Financial Information
 - ASAE 3100 - Compliance Engagements
 - Auditing Standard ASA 315 - Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment
 - Auditing Standard ASA 500 - Audit Evidence
 - Auditing Standard ASA 530 - Audit Sampling
 - Auditing Standard ASA 705 – Modifications to the Opinion in the Independent Auditors Report

5. **Assessment of Previous Recommendations:** We assessed recommendations from prior audits, considering resolutions during the current audit or review period and unresolved issues at the audit's conclusion.

6. **Timely Compliance:** We evaluated Licensee obligations requiring timely completion of activities, such as responding to customer complaints or providing annual compliance and performance reports to the ERA.

7. **Inadequacies Disclosure:** Identified control inadequacies have been disclosed in the observations section of the report.

8. **Control Ratings:** Control environment and control procedures were rated only for the following:

- Audit priority of 1, 2, or 3 (as assigned)
- Non-compliant Licensee obligations (compliance rating of 2, 3, or 4).

9. **Opportunities for improvement:** Any recommendations for licence obligations, that received a rating other than those in the point 8 above were directly provided to the licensee.

Assistance from the Licensee: The Licensee provided necessary assistance, including access to facilities and business premises, materials, information sources, and relevant personnel as required by Section 4.1 of the Audit Guidelines (2019). The performance audit was conducted by Nicole Davies and required a total of 80 hours of her time.

Table 6 - List of Personnel Who Participated in the Performance Audit

No.	Name	Company	Position Description
1	Eva Mitchell	Amanda Energy	Senior Analyst
2	Alex Bell	Amanda Energy	Office & Finance Manager

2.6 Performance Audit Summary of Findings

Table 7 - Performance Audit Compliance Summary

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
9. ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS												
6	Electricity Industry Customer Transfer Code, CI 3.2(2)	4					NP	1				
7	Electricity Industry Customer Transfer Code, CI 3.4(1)	4					NP	1				
8	Electricity Industry Customer Transfer Code, CI 3.5(3)	4					NP					NR
9	Electricity Industry Customer Transfer Code, CI 3.6(2)	4					NP					NR
16	Electricity Industry Customer Transfer Code, CI 3.9(1)	4					NP	1				
17	Electricity Industry Customer Transfer Code, CI 3.9(2)	4					NP					NR
18	Electricity Industry Customer Transfer Code, CI 3.9(3)	4					NP	1				
19	Electricity Industry Customer Transfer Code, CI 3.9(4)	4					NP	1				
23	Electricity Industry Customer Transfer Code, CI 4.2(2)	4					NP	1				
24	Electricity Industry Customer Transfer Code, CI 4.3	4					NP	1				
25	Electricity Industry Customer Transfer Code, CI 4.4(1)	4					NP	1				
26	Electricity Industry Customer Transfer Code, CI 4.4(2)	4					NP	1				
27	Electricity Industry Customer Transfer Code, CI 4.5(1)	4					NP	1				
28	Electricity Industry Customer Transfer Code, CI 4.6(3)	4					NP					NR
29*Δ	Electricity Industry Customer Transfer Code, CI 4.7	3	A						2			
30	Electricity Industry Customer Transfer Code, CI 4.8(2)	4					NP	1				
34	Electricity Industry Customer Transfer Code, CI 4.9(6)	4					NP	1				
37A.+	Electricity Industry Customer Transfer Code, CI 4.10(4)	4					NP	1				
39	Electricity Industry Customer Transfer Code, CI 4.11(3)	4					NP	1				
40	Electricity Industry Customer Transfer Code, CI 4.12(3)	5					NP					NR
43	Electricity Industry Customer Transfer Code, CI 4.15	5					NP	1				
44	Electricity Industry Customer Transfer Code, CI 4.16	4					NP	1				
45	Electricity Industry Customer Transfer Code, CI 4.17	4					NP	1				
48~	Electricity Industry Customer Transfer Code, CI 5.2	4					NP	1				
48A.	Electricity Industry Customer Transfer Code, CI 6.1	4					NP	1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
49	Electricity Industry Customer Transfer Code, CI 6.2	4					NP	1				
52	Electricity Industry Customer Transfer Code, CI 6.4(1)	4					NP					NR
53	Electricity Industry Customer Transfer Code, CI 6.4(2)	4					NP					NR
54	Electricity Industry Customer Transfer Code, CI 6.6	4					NP	1				
55	Electricity Industry Customer Transfer Code, CI 7.1(1)	5					NP					NR
56	Electricity Industry Customer Transfer Code, CI 7.1(2)	5					NP					NR
57	Electricity Industry Customer Transfer Code, CI 7.1(3)	4					NP					NR
58	Electricity Industry Customer Transfer Code, CI 7.2(4)	4					NP					NR
59	Electricity Industry Customer Transfer Code, CI 7.3(2)	5					NP					NR
11. ELECTRICITY INDUSTRY (CUSTOMER CONTRACTS) REGULATIONS – LICENCE CONDITIONS AND OBLIGATIONS												
79	Electricity Industry (Customer Contracts) Regulations, Reg 5	4					NP	1				
80	Electricity Industry (Customer Contracts) Regulations, Reg 6	4					NP	1				
81	Electricity Industry (Customer Contracts) Regulations, Reg 7	4					NP	1				
82	Electricity Industry (Customer Contracts) Regulations, Reg 8	4					NP	1				
83	Electricity Industry (Customer Contracts) Regulations, Reg 9	4					NP	1				
84	Electricity Industry (Customer Contracts) Regulations, Reg 10	4					NP	1				
85	Electricity Industry (Customer Contracts) Regulations, Reg 11	4					NP	1				
86**	Electricity Industry (Customer Contracts) Regulations, Reg 12	4					NP	1				
86A+*	Electricity Industry (Customer Contracts) Regulations, Reg 12	4					NP					NR
87*	Electricity Industry (Customer Contracts) Regulations, Reg 13	4	A						2			
88	Electricity Industry (Customer Contracts) Regulations, Reg 14	4					NP	1				
89*Δ	Electricity Industry (Customer Contracts) Regulations, Reg 15	3	A						2			
90*Δ	Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34	3		B					2			
91	Electricity Industry (Customer Contracts) Regulations, Reg 17	4					NP	1				
92	Electricity Industry (Customer Contracts) Regulations, Reg 18	4					NP	1				
93	Electricity Industry (Customer Contracts) Regulations, Reg 19	4					NP	1				
94	Electricity Industry (Customer Contracts) Regulations, Reg 20	4					NP	1				
95	Electricity Industry (Customer Contracts) Regulations, Reg 21	4					NP	1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
96	Electricity Industry (Customer Contracts) Regulations, Reg 32	4					NP	1				
97	Electricity Industry (Customer Contracts) Regulations, Reg 93(2)	4					NP	1				
98	Electricity Industry (Customer Contracts) Regulations, Regs 93(3) and (4)	3	A					1				
98A	Electricity Industry (Customer Contracts) Regulations, Reg 34A	4	A						2			
98C	Electricity Industry (Customer Contracts) Regulations, Reg 34C	4	A						2			
100	Electricity Industry (Customer Contracts) Regulations, Reg 38	4					NP	1				
12. ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS												
101	Electricity Industry Act, section 13(1)	4					NP	1				
105	Economic Reg Authority (Licensing Funding) Regs 2014	4	A						2			
106	Electricity Industry Act, section 31(3)	5					NP	1				
107	Electricity Industry Act, section 41(6)	4					NP					NR
108	Electricity Industry Act, section 54(1)	4					NP	1				
109	Electricity Industry Act, section 54(2)	4					NP	1				
111	Electricity Industry Act, section 101	4					NP	1				
13. ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS												
114	Retail Licence, condition 6.3.1	4					NP	1				
116	Retail Licence, condition 6.4.2	5					NP	1				
117	Retail Licence, condition 6.4.3	4					NP	1				
118	Retail Licence, condition 6.5.1	4					NP	1				
119	Retail Licence, condition 4.3.1	4					NP	1				
121	Retail Licence, condition 5.3.2	4					NP	1				
123	Retail Licence, condition 4.4.1	4					NP					NR
124	Retail Licence, condition 4.5.1	4		B					2			
125	Retail Licence, condition 3.8.1 and 3.8.2	4					NP	1				
126	Retail Licence, condition 3.7.1.1	4					NP	1				
14. CODE OF CONDUCT – LICENCE CONDITIONS AND OBLIGATIONS												
MARKETING												
129A	2022 Code of Conduct, CI 8	4					NP	1				
130	2022 Code of Conduct, CI 9(1)	4					NP					NR
131	2022 Code of Conduct, CI 9(2)	3	A					1				
132	2022 Code of Conduct, CI 10(1)	3	A					1				
133	2022 Code of Conduct, CI 10(2)	4	A						2			

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
133A	2022 Code of Conduct, CI 10(3)	4					NP	1				
135	2022 Code of Conduct, CI 10(5)	4					NP	1				
137	2022 Code of Conduct, CI 11(2)	3	A					1				
138	2022 Code of Conduct, CI 12(1)	4					NP					NR
139	2022 Code of Conduct, CI 12(2)	4					NP	1				
140	2022 Code of Conduct, CI 13	4					NP	1				
141	2018 Code of Conduct, CI 2.9	4					NP					NR
142	2018 Code of Conduct, CI 2.10	4					NP	1				
CONNECTION												
143	2022 Code of Conduct, CI 18(1)	4					NP	1				
144	2022 Code of Conduct, CI 18(2)	4					NP	1				
BILLING												
145	2022 Code of Conduct, CI 19(1)	4					NP	1				
146	2018 Code of Conduct, CI 4.2(1)	4					NP					NR
146A	2022 Code of Conduct, CI 20(1)	4					NP					NR
148	2022 Code of Conduct, CI 20(3)	4					NP					NR
149	2022 Code of Conduct, CI 20(4)	4					NP					NR
150	2022 Code of Conduct, CI 20(5)	4					NP					NR
151	2022 Code of Conduct, CI 20(6)	4					NP					NR
152	2018 Code of Conduct, CI 4.3(1)	4					NP					NR
153	2018 Code of Conduct, CI 4.3(2)	4					NP					NR
154	2018 Code of Conduct, CI 4.4	4					NP	1				
155	2018 Code of Conduct, CI 4.5(1)	4					NP	1				
155A	2022 Code of Conduct, CI 21(1)	4					NP	1				
156	2022 Code of Conduct, CI 21(9)	4					NP					NR
157	2018 Code of Conduct, CI 4.6	4					NP	1				
157A	2022 Code of Conduct, CI 22(1)	4					NP	1				
157B	2022 Code of Conduct, CI 22(2)	4					NP					NR
158	2022 Code of Conduct, CI 22(3)	5					NP	1				
158A	2022 Code of Conduct, CI 22(4)	4					NP	1				
159	2018 Code of Conduct, CI 4.8(1)	4					NP	1				
160	2022 Code of Conduct, CI 23(1)	4	A					1				
161	2022 Code of Conduct, CI 23(2)	4					NP	1				
162	2018 Code of Conduct, CI 4.9	4					NP	1				
163	2022 Code of Conduct, CI 24(2)	5					NP	1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
164	2018 Code of Conduct, CI 4.11(1)	4					NP	1				
165	2018 Code of Conduct, CI 4.11(2)	4					NP					NR
166	2022 Code of Conduct, CI 25(2)	4					NP					NR
166A	2022 Code of Conduct, CI 25(3)	4					NP					NR
167	2022 Code of Conduct, CI 26(2)	4					NP					NR
168	2018 Code of Conduct, CI 4.14(1)	5					NP	1				
169	2018 Code of Conduct, CI 4.14(2)	4					NP					NR
170	2018 Code of Conduct, CI 4.14(3)	4					NP					NR
171	2022 Code of Conduct, CI 27(1)	4					NP	1				
172	2022 Code of Conduct, CI 27(2)(a)	3	A					1				
173	2022 Code of Conduct, CI 27(2)(b)	4					NP	1				
174	2022 Code of Conduct, CI 27(3)	4					NP	1				
175	2022 Code of Conduct, CI 27(4)	4					NP					NR
175A	2022 Code of Conduct, CI 28(1)	4					NP	1				
175B	2022 Code of Conduct, CI 28(3)	4					NP					NR
176	2022 Code of Conduct, CI 29(1)	4					NP					NR
177	2022 Code of Conduct, CI 30(1)	5					NP					NR
178	2022 Code of Conduct, CI 30(2)	4					NP					NR
179	2022 Code of Conduct, CI 30(3)	5					NP					NR
180	2018 Code of Conduct, CI 4.18(6)	5					NP					NR
181	2022 Code of Conduct, CI 30(6)	4					NP					NR
181A	2022 Code of Conduct, CI 30(7)	5					NP					NR
181B	2022 Code of Conduct, CI 30(8)	5					NP					NR
182	2018 Code of Conduct, CI 4.19(1)	4					NP	1				
183	2018 Code of Conduct, CI 4.19(2)	5					NP					NR
183A	2022 Code of Conduct, CI 31(1)	4					NP	1				
183B	2022 Code of Conduct, CI 31(2)	4					NP					NR
183C	2022 Code of Conduct, CI 31(3)	4					NP					NR
183D	2022 Code of Conduct, CI 31(4)	4					NP					NR
183E	2022 Code of Conduct, CI 31(5)	4					NP	1				
184	2018 Code of Conduct, CI 4.19(3)	4					NP					NR
184A	2022 Code of Conduct, CI 32(1)	4					NP					NR
185	2018 Code of Conduct, CI 4.19(4)	5					NP					NR
186	2018 Code of Conduct, CI 4.19(7)	5					NP					NR
PAYMENT												

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
187	2022 Code of Conduct, CI 93	4					NP	1				
188	2022 Code of Conduct, CI34(1)	4					NP	1				
189	2018 Code of Conduct, CI 5.3	4					NP	1				
190	2022 Code of Conduct, CI 95(1) to (3)	4					NP	1				
190A	2022 Code of Conduct, CI 95(4) to (6)	4					NP					NR
191A	2022 Code of Conduct, CI 36	4					NP	1				
197	2022 Code of Conduct, CI 38(1)	4					NP	1				
198	2022 Code of Conduct, CI 38(2)	4					NP					NR
199	2022 Code of Conduct, CI 38(4)	4					NP					NR
201	2022 Code of Conduct, CI 39(2)	4					NP					NR
201A.	Code of Conduct, clause 56(2)	5					NP					NR
PAYMENT ASSISTANCE												
228	2022 Code of Conduct, CI 47	2	A					1				
DISCONNECTION												
229	2022 Code of Conduct, CI 48	2	A					1				
230	2022 Code of Conduct, CI 49(a)	2	A					1				
232	2022 Code of Conduct, CI 51(2)	2	A					1				
232A	2022 Code of Conduct, CI 51(4)	2	A									NR
234	2022 Code of Conduct, CI 52	2	A					1				
235	2018 Code of Conduct, CI 7.7(1)	2	A									NR
236	2018 Code of Conduct, CI 7.7(2)	2	A									NR
240	2018 Code of Conduct, CI 7.7(6)	4					NP					NR
241	2018 Code of Conduct, CI 7.7(7)	4					NP					NR
RECONNECTION												
242	2022 Code of Conduct, CI 53(2)	4					NP	1				
243	2022 Code of Conduct, CI 53(3)	4					NP	1				
INFORMATION & COMMUNICATION												
271D.	2022 Code of Conduct, CI 68(1)	4					NP	1				
271E	2022 Code of Conduct, CI 68(3)	4					NP	1				
271F	2022 Code of Conduct, CI 68(4)	4					NP					NR
272	2018 Code of Conduct, CI 10.1(1)	4					NP	1				
273	2022 Code of Conduct, CI 69	4					NP	1				
274	2018 Code of Conduct, CI 10.1(3)	4					NP	1				
274A	2022 Code of Conduct, CI 71(2)	4					NP	1				
280	2022 Code of Conduct, CI 71(2)	1	A					1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
281	2018 Code of Conduct, CI 10.4	4					NP					NR
282	2022 Code of Conduct, CI 74	4					NP					NR
290	2022 Code of Conduct, CI 77	5					NP	1				
291	2018 Code of Conduct, CI 10.10(1)	4					NP					NR
292	2018 Code of Conduct, CI 10.10(2)	3	A					1				
297	2022 Code of Conduct, CI 79(2)	4					NP					NR
LIFE SUPPORT EQUIPMENT SCHEME												
297B	2022 Code of Conduct, CI 82(2)	2	A									NR
297C	2022 Code of Conduct, CI 82(3)	4					NP					NR
297D	2022 Code of Conduct, CI 82(5)	2	A									NR
297H	2022 Code of Conduct, CI 85(1)	4					NP					NR
297I	2022 Code of Conduct, CI 85(2)	4					NP					NR
297(J)	2022 Code of Conduct, CI 86(2)	4					NP					NR
297(K)	2022 Code of Conduct, CI 86(3) and (4)	4					NP					NR
297(L)	2022 Code of Conduct, CI 86(6)	4					NP					NR
297(N)	2022 Code of Conduct, CI 86(8)	4					NP					NR
298	2022 Code of Conduct, CI 87(1)	4					NP	1				
299	2022 Code of Conduct, CI 87(2)	2	A						2			
299A	2022 Code of Conduct, CI 87(3)	4					NP	1				
300	2018 Code of Conduct, CI 12.1(3)	4					NP	1				
301	2022 Code of Conduct, CI 88	4					NP	1				
301A	2022 Code of Conduct, CI 89	4					NP	1				
302	2018 Code of Conduct, CI 12.2	2	A						2			
303	2018 Code of Conduct, CI 12.3	4					NP	1				
304	2022 Code of Conduct, CI 90	4					NP	1				
COMPLAINTS & DISPUTE RESOLUTION												
305	2018 Code of Conduct, CI 13.1	2	A					1				
306	2018 Code of Conduct, CI 13.2	2	A					1				
307	2018 Code of Conduct, CI 13.3	4	A					1				
SERVICE STANDARD PAYMENTS												
308	2018 Code of Conduct, CI 14.1(1)	4					NP					NR
308A.	2022 Code of Conduct, CI 94(1)	4					NP					NR
308B.	2022 Code of Conduct, CI 94(2)	4					NP					NR
310	2022 Code of Conduct, CI 95(1)	4					NP					NR
312	2022 Code of Conduct, CI 96	4					NP					NR

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
315	2022 Code of Conduct, CI 100(1)	4					NP	1				
15 ELECTRICITY INDUSTRY METERING CODE 2012 – LICENCE CONDITIONS AND OBLIGATIONS												
324	Electricity Industry Metering Code, CI 3.3B	4					NP					NR
339	Electricity Industry Metering Code, CI 3.11(3)	4					NP					NR
371	Electricity Industry Metering Code, CI 4.4(1)	5					NP					NR
372	Electricity Industry Metering Code, CI 4.5(1)	5					NP	1				
373	Electricity Industry Metering Code, CI 4.5(2)	4					NP	1				
388	Electricity Industry Metering Code, CI 5.4(2)	4					NP	1				
402	Electricity Industry Metering Code, CI 5.17(1)	4					NP	1				
406	Electricity Industry Metering Code, CI 5.19(1)	5					NP	1				
407	Electricity Industry Metering Code, CI 5.19(2)	5					NP	1				
408	Electricity Industry Metering Code, CI 5.19(3)	4		B					2			
410	Electricity Industry Metering Code, CI 5.19(6)	5					NP	1				
416	Electricity Industry Metering Code, CI 5.21(5)	4					NP	1				
417	Electricity Industry Metering Code, CI 5.21(6)	4					NP	1				
435	Electricity Industry Metering Code, CI 5.27	4					NP					NR
448	Electricity Industry Metering Code, CI 6.1(2)	4					NP	1				
451	Electricity Industry Metering Code, CI 7.2(1)	5					NP	1				
453	Electricity Industry Metering Code, CI 7.2(4)	4					NP					NR
454	Electricity Industry Metering Code, CI 7.2(5)	4					NP					NR
455	Electricity Industry Metering Code, CI 7.5	4					NP	1				
456	Electricity Industry Metering Code, CI 7.6(1)	4					NP	1				
457	Electricity Industry Metering Code, CI 8.1(1)	5					NP					NR
458	Electricity Industry Metering Code, CI 8.1(2)	5					NP					NR
459	Electricity Industry Metering Code, CI 8.1(3)	5					NP					NR
460	Electricity Industry Metering Code, CI 8.1(4)	4					NP					NR
461	Electricity Industry Metering Code, CI 8.3(2)	5					NP					NR

*Obligation No. Electricity Compliance Reporting Manual – June 2020

** Non-Compliance in 2017 Audit or Non-Compliance Report submitted during the audit period.

Note: A Controls Rating is mandatory for audit priorities 1, 2, or 3 and a comprehensive report of the audit findings is included in Appendix 1.

2.7 Summary Performance Audit Recommendations & Action Plans

Recommendations made within the report are summarised as detailed below and will be reviewed and included in the post audit implementation plan (if required) by the licensee to ensure compliance with requirements.

Table 8 - A Resolved during the current audit period

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
01/2023	<p>29*Δ</p> <p>A 2</p> <p>Electricity Industry Customer Transfer Code, CI 4.7</p> <p>A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.</p> <p>The Licensee confirmed that during the audit period, the requirements in relation to the nominated transfer dates were not met. A review of all customer transfers and the Compliance Breach Register indicated that there were 13 CTRs rejected due to "Transfer Date" non-compliances for the period 21/09/2021 to 8/12/2022.</p> <p>The Licensee's internal review processes were notably improved since the previous audit and as a result of an internal audit process a further control in the development of a spreadsheet tool to confirm the minimum lead-time calculator for CTRs. The tool was effective in preventing further non-compliances</p>	<p>01/2023: The Licensee's control procedures were improved following the 2021 Performance Audit and this was demonstrated with the revision of the control procedure, internal audits identifying the non-compliances, recording in the compliance breach register and the development of the Min Lead Timeframe Calculator).</p> <p>Additional non-compliances were identified during the 2023 audit period and subsequently lead to the Licensee developing an excel spreadsheet for further process control (refer 175.1 - Min Lead Timeframe Calculator (2022 - 2024)). It is the auditor's opinion that the current control processes are adequate to ensure ongoing compliance with requirements of obligation 29. Compliance was noted for the period 9 December 2022 to 31 August 2023. There are no further recommendations in relation to obligation 29.</p>	No further action required.

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
	<p>for the audit period 9 December 2022 to 31 August 2023.</p>	<p>DATE RESOLVED: Compliance noted from 9/12/2022</p>	
	<p>It was noted that the non-compliances were included in the 2022 and 2023 annual compliance reports required during the audit period.</p>		
<p>02/2023</p>	<p>87*</p> <p>A 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 13</p> <p>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 prices information.</p> <p>The Licensee confirmed that during the audit period 01/09/2021 to 31/8/2023, Amanda Energy's non-standard form contract did not comply with clause 13(2)(a) and (b) of the Electricity Industry (Customer Contracts) Regulations 2005 (amendment regulations came into effect on 01/01/2023).</p> <p>It was noted Amanda Energy updated their non-standard form contracts effective 21/02/2023, ensuring compliance with this clause.</p> <p>In an effort to improve the control environment, it was noted the</p>	<p>02/2023: The Licensee updated their non-standard form contracts effective 21/02/2023, ensuring compliance with this clause 13(2)13(2)(a) and (b) of the Electricity Industry (Customer Contracts) Regulations 2005 as amended. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p> <p>DATE RESOLVED: Compliance was effective from 21/02/2023</p>	<p>No further action required.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
03/2023	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p> <p>Licensee engaged external legal firms to assist with contract updates.</p> <p>89*Δ A 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 15</p> <p>A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.</p> <p>The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs described the matters relating to the termination of the contract that are specified in the regulation.</p> <p>Specifically noted as compliant obligations; 15.2(ca) in relation to circumstances where the customer consumes more than 160 MWh of electricity in any period of 12 months; and 15.1(b) deal with the procedures for and in relation to termination of the contract.</p> <p>Verification of compliance was noted in version 1.5 ESA-SUC T&Cs (refer clause 2.4).</p>	<p>03/2023: The Licensee updated their non-standard form contracts effective 8/10/2021, ensuring compliance with this regulation. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p> <p>DATE RESOLVED: Compliance was effective from 8/10/2021.</p>	<p>No further action required.</p>
05/2023	<p>98A A 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 34A</p> <p>A non-standard fixed term contract must detail the contract expiry date, customer options available for supply following expiry, the terms</p>	<p>05/2023: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34A of the Electricity Industry (Customer Contracts)</p>	<p>No further recommendations were made.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
	<p>and conditions that apply after expiry and the way the retailer will provide the notification in the manner specified.</p> <p>The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34A of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 19.2) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>	<p>Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1A) (refer NSFC clause 19.2) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p> <p>DATE RESOLVED: Compliance was effective from 21/02/2023.</p>	
06/2023	<p>98C</p> <p>B 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 34C</p> <p>A non-standard contract, entered into by a non-residential customer, is required to state whether the customer must pay a security</p>	<p>06/2023: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34C of the Electricity Industry (Customer Contracts)</p>	<p>No further recommendations are made.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
	<p>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.</p> <p>The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34C of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 20) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>	<p>Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 20) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p> <p>DATE RESOLVED: Compliance was effective from 21/02/2023.</p>	
07/2023	105 A 2	07/2023: The Licensee confirmed that during the audit period, Amanda Energy paid the	No further recommendations were made.

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
	<p>Economic Reg Authority (Licensing Funding) Regs 2014</p> <p>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p> <p>The Licensee confirmed that during the audit period, Amanda Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in March 2022 relating to standing data charges that was paid 1 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The Office & Finance Manager confirmed the controls in relation payments.</p>	<p>prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in March 2022 relating to standing data charges that was paid 1 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The Office & Finance Manager confirmed the controls in relation payments, i.e., corporate outlook calendar. The non-compliance was administrative and had not material effect on customers or third parties. As such, no recommendation is made.</p> <p>DATE RESOLVED: Compliance was observed from 1/4/2023 to 31/8/2023.</p>	
<p>09/2023</p>	<p>133</p> <p>A 1</p> <p>2022 Code of Conduct, CI 10(2)</p> <p>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.</p> <p>The Licensee confirmed that for the duration of the audit period applicable (i.e., 1/9/2021 to 20/2/2023), Amanda Energy</p>	<p>09/2023: The Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved.</p> <p>Compliance was confirmed during the site audit (i.e., the ESA NSFC Notification detailing the differences between AE's</p>	<p>No further recommendations were made.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>	<p>NSFC and SFC). There are no further recommendations made.</p> <p>DATE RESOLVED: 1/7/2023-31/8/2023</p>	
	<p>included a reference to general information on the safe use of electricity in the NSFC new contract process.</p>		
	<p>The Licensee used the Welcome Pack to convey the requirements and confirmation of inclusion of all information as specified in subclause 2.3(2) was noted.</p>		
	<p>For the audit period 1/9/2021 to 20/2/2023, subsequent to the effect of the 2022 Code of Conduct, the Licensee did not include the requirement of clause 10(2)(a)(ii) of the Code of Conduct; which came into effect 20/02/2023.</p>		
	<p>Specifically requiring Amanda Energy prior to entering into a non-standard contract with a customer, to details of the difference between the non-standard contract and the standard form contract. The Licensee engaged a legal expert to ensure the requirements were met moving forward.</p>		
<p>10/2023</p>	<p>299</p> <p>A 2</p> <p>2022 Code of Conduct, CI 87(2) -</p> <p>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). Amanda Energy's complaints handling process did not comply with subclauses 12.1(2)(a) and (c), namely in that it did not comply with</p>	<p>The Licensee addressed the non-compliance in relation to Amanda Energy's obligations to establish complaints handling procedures in the 2021 PAIP and in the 2022 Annual Compliance Report. Corrective actions were verified, particularly with respect to distinguishing a query from a complaint.</p>	<p>No further recommendations were made.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	<p>Licence obligation reference number² /</p> <p>Controls and Compliance Rating</p> <p>Legislation / Section, Clause or Regulation /</p> <p>Details of Non-Compliance or Inadequacy of Controls</p>		
	<p>AS/NZS 1002:2014 in differentiating between a complaint and a query, nor did it specifically use wording which referenced that Amanda Energy would deal with complaints about Amanda Energy, our electricity marketing agents, or marketing.</p>	<p>DATE RESOLVED: 17/3/2023</p>	
<p>11/2023</p>	<p>302</p> <p>A 2</p> <p>2018 Code of Conduct, CI 12.2 - A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.</p> <p>Amanda Energy did not comply with regulation 12.2 which required retailers to comply with the ERA's guideline distinguishing queries from complaints.</p>	<p>Refer to recommendation 10/2023 in relation to obligation 299.</p> <p>DATE RESOLVED: 17/3/2023</p>	<p>No further recommendations were made.</p>
<p>12/2023</p>	<p>408</p> <p>B 2</p> <p>Electricity Industry Metering Code, CI 5.19(3)</p> <p>Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.</p> <p>The Licensee confirmed that during the audit period, Amanda Energy established procedures with respect to new tenants to ensure that when a new customer took over the supply address, a site details notification update is completed.</p>	<p>12/2023: It was noted, during the period May to December 2022, on 3 occasions the Licensee did not update Customer Details Notification (CDN) within 1 business day as required.</p> <p>The Licensee has reviewed control processes and no further non-compliance have been noted. There are no further recommendations made.</p> <p>DATE RESOLVED: Compliance was noted from 9/12/2022 to 31/8/2023.</p>	<p>No further recommendations were made.</p>

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	Licence obligation reference number ² / Controls and Compliance Rating <i>Legislation</i> / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls		

However, it was noted, during the period May to December 2022, on 3 occasions the Licensee did not update Customer Details Notification (CCDN) within 1 business day as required.

The Licensee has reviewed control processes and not further non-compliance have been noted.

Table 9 - B Unresolved During the Current Audit Period

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating <i>Legislation</i> / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
04/2023	<p>90*Δ</p> <p>A 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34</p> <p>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.</p> <p>The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p> <p>The Licensee confirmed that for the duration of the audit period the SFC was compliant with regulation 16.</p> <p>Amanda Energy's NSFC was non-compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) (1A) for the period 01/01/2023 to 20/02/23. This was due to the requirements of amendment regulations not being incorporated into the NSFC until 21/02/2023. • Regulation 34 was non-compliant for the applicable period effective from 01/01/2023 to 31/8/2023, as the changes made to the contracts were not communicated to the customers as required. 	<p>04/2023: The Licensee updated their non-standard form contracts throughout the audit period to reflect the requirements of regulation 16 and it was confirmed that the Licensee was compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) and (2) for the applicable period effective from 8/10/2021 to 01/01/2023. • Regulation 16 (1A) was compliant for the applicable period effective from 21/02/2023 to 31/8/2023. <p>Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates.</p> <p>However, the Licensee has not formally communicated the changes to the customers as required by Regulation 34. It is recommended that the Licensee request the changes to be highlighted by the legal advisors and that this highlighted document is then forwarded to the customers in order to comply with Regulation 34.</p>	Refer 2023 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
08/2023	<p>124 B 2 Retail Licence, condition 4.4.1</p> <p>During the audit period the Licensee complied with the dates for the submission of reporting requirements, however, non-compliance was noted in regard to late payment of prescribed fees and the failure to include the non-compliance in the subsequent annual compliance report. The Control Procedures in relation to the correct collection and handling of data that the Licensee supplies to ERA and/or compliance related activities were not adequate to ensure accurate and timely reporting of information to the ERA.</p>	<p>RECOMMENDATION: Whilst it was noted that the Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved. The requirement to ensure the accuracy of non-compliance reporting to the ERA still required some improvements to the control environment and the monitoring of the controls. As such, to ensure ongoing compliance, the Licensee should further improve:</p> <ul style="list-style-type: none"> • the updates to controls established required from changes in legislative requirements, such as the Internal Compliance Manual, Life Support Register, etc • the formalisation of the internal audit compliance frameworks as related to legislative updates and with consideration of the future reporting requirements. • the capacity of the internal resources responsible to ensure compliance with the requirements of the electricity retail licence. 	Refer 2023 PAIP

² The reference number allocated to the licence obligation in the Electricity or Gas Compliance Reporting Manual.

3. STATUS OF RECOMMENDATIONS FROM THE 2021 PERFORMANCE AUDIT

There were 17 non-compliances noted in the previous audit period, three of which were resolved to the satisfaction of the auditor prior to end of audit period and 14 non-compliances, required the corrective action plan to be developed and submitted in a post audit implementation plan (PAIP) as published by the ERA. The current status of the previous audit recommendations is shown in Table 10.

Table 10 - Status of Recommendations for Non-Compliances from the Previous Audit

A 2021 Non-Compliance Resolved During Current Audit Period			
REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating Legislation / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
02/2021	<p>89</p> <p>B 2</p> <p>Electricity Industry (Customer Contracts) Regulations, Reg 15</p> <p>A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent and 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>A register has been created to track all potential future updates to the NSFC, the register requires information such as – date valid from, version number, detailed description of updates, date archived, link to AE publication of new T&Cs.</p> <p>A master template of NSFC T&Cs is also saved on file, password protected, and has been updated to include asterisks where specific information is required to be included in the T&Cs per the compliance manual's auditing requirements. This master NSFC T&Cs has been approved for ongoing use. A procedure (173.0) has been created for the ongoing control & updates to the master template.</p> <p>The Licensee updated their non-standard form contracts effective 8/10/2021, ensuring compliance with this regulation. Additionally, it was noted the Licensee engaged external</p>	<p>8/10/2021</p> <p>No further action required.</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	legal firms to assist with contract updates. PAIP REF # 02/2021 - NSFC has been updated post-audit period to implement compliance (auditor has reviewed and acknowledged this). However further action required includes Developing a Control Procedure for the update of ESA-SUCs & NSFCs, including creating a master template, applying document control to the both the ESA and the NFSC, tracking changes on the master template and highlighting any compliance related in obligations (i.e. contrast font or symbol) to draw attention to the compliance requirement for the user updating the document. Develop control processes for training, internal audit, management review and change management processes to ensure ongoing compliance.	
03/2021	90 B 2 Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34 For the duration of the audit period, the Licensee's NSFC did not accurately inform the customer of all obligations as required by the Regulations. Specifically, the NSFC did not accurately describe the processes or detail requirements for	As for recommendation 02/2021 PAIP REF # 03/2021 - As for recommendation 02/2021	31/01/2022 Further corrective action has been noted in the 2023 Performance Audit. Refer recommendation 04/2023.

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating Legislation / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
04/2021	<p>98 B 2 Electricity Industry (Customer Contracts) Regulations, Regs 93(3) and (4)</p> <p>For the duration of the audit period, the Licensee's NSFC did not describe the requirement that a fixed term contract must authorise the customer to terminate the contract at any time by giving notice to the retailer not less than 20 days before the day on which the customer wants the contract to end. Additionally, it did not specify amount the payable by the customer, by way of penalty, in the event that the customer terminated the contract before the expiry of the term of the contract.</p>	<p>It was noted, the Licensee has updated the NSFC to include compliance requirements with regulation 98. as reported in the 2022 Annual Compliance Report compliance and as was confirmed during the audit from 1/9/2021 It was understood the Licensee engaged external legal firms to assist with contract updates.</p> <p>PAIP REF # 04/2021 - As for recommendation 02/2021</p>	<p>1/09/2021</p> <p>No further action required.</p>
05/2021	<p>105 A 2 Economic Reg Authority (Licensing Funding) Regs 2014 ERL 20 Licence Condition 4.2.1</p> <p>The Licensee did not pay the prescribed licence fees to the ERA in accordance with the obligations,</p>	<p>NIL- Resolved during the previous audit period.</p> <p>PAIP REF - NA</p>	<p>18/10/2019</p> <p>No further action required</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls		
	for one invoice in 2019 relating to Standing Data Charges that was paid 2 days overdue. All other prescribed payments were made in accordance with the Economic Regulation Authority (Licensing Funding) Regulations 2014		
07/2021	131 B 2 2022 Code of Conduct, CI 9(2) For the duration of the audit period the Licensee did not include a reference to general information on the safe use of electricity in the SFC new contract process. There were 3 occasions where this information was not communicated.	Although outside the scope of the audit period, the Licensee has made changes to the control procedure and email templates for the SFC used to communicate the requirements. Consideration could be given to including the information on the company's website by creating a link. Inclusion of a regulatory information section could be considered, such as that required by obligation 292 and the Retail Datasheets. PAIP REF # 07/2021 - Control procedures were updated post-audit period to implement compliance (auditor has reviewed and acknowledged this). Auditor suggested the Amanda Energy website could be improved by creating a specific compliance page in an effort of "best practice" to enable our customers to find information more easily. – to be taken under consideration by Amanda Energy management.	31/01/2022 No further action required
08/2021	133 B 2	Although outside the scope of the audit period, the Licensee has amended the Welcome Pack, NSFC	1/7/2023- 31/8/2023

A 2021 Non-Compliance Resolved During Current Audit Period			
REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	<p>2022 Code of Conduct, CI 10(2)</p> <p>For the duration of the audit period the Licensee did not include a reference to general information on the safe use of electricity in the NSFC new contract process. The Licensee used a NSFC and confirmation of inclusion of all information as specified in subclause 2.3(2) with the exception of 2.3(2)(j) was noted</p>	<p>control procedure and email template to reference the obligation and refers customers to Western Power Website for information. Consideration could be given to including the information on the company's website by creating a link. Inclusion of a regulatory information section could be considered, such as that required by obligation 292 and the Retail Datasheets.</p> <p>PAIP REF # 08/2021 - Control procedures were updated post-audit period to implement compliance (auditor has reviewed and acknowledged this). Auditor suggested the Amanda Energy website could be improved by creating a specific compliance page in an effort of "best practice" to enable our customers to find information more easily. – to be taken under consideration by Amanda Energy management.</p>	No further action required
09/2021	<p>137</p> <p>B 2</p> <p>2022 Code of Conduct, CI 11(2)</p> <p>The Licensee reported in the 2021 Annual Compliance Report one occasion in which a BDM did not leave sufficient contact information for the customer to contact Amanda Energy and verify a query.</p>	<p>The licensee has since initiated the generation of quarterly memos to remind BDMs of their marketing obligations under the Code of Conduct and developed a Control Procedure. The Licensee could consider further strengthening their procedural controls and applying contrast text or symbols to highlight steps that are compliance related in</p>	<p>31/01/2022</p> <p>No further action required</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
10/2021	<p>160 A 2 2022 Code of Conduct, CI 23(1) For the duration of the audit period, the License did not clearly specify on the customer's bill, that the customer could request the basis/reason for the estimation, verification of energy data and a meter reading. It was noted the bills did specify that the bill was based on estimation.</p>	<p>the newly developed Control Procedure. Incorporation of this enhancement in the memo generated quarterly and BDM Induction could be considered.</p> <p>The Licensee rectified the non-compliance within the audit period and sample bills sighted were compliant with the obligation. There are no further recommendations made in regard to this obligation.</p> <p>PAIP REF: NA</p>	<p>31/08/2021</p> <p>No further action required</p>
11/2021	<p>172 B 2 2022 Code of Conduct, CI 27(2)(a) During the audit period Amanda Energy's billing process did not include a reference to the availability of meter testing following bill review</p>	<p>The Licensee has amended the control procedure. The effectiveness of the licensee's suggested initiative to commit to ensuring compliance memos and training will be implemented by Amanda Energy management team could be considered as part of an internal audit program.</p> <p>PAIP REF # 11/2021 - Control procedures were updated post-audit period to implement compliance (auditor has reviewed and acknowledged this). In order to further improve: Implement an internal audit program to periodically review the effectiveness of current internal</p>	<p>31/01/2022</p> <p>No further action required</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	compliance control practices (training / memos).	
12/2021	229 B 2 2022 Code of Conduct, CI 48 The Analyst confirmed that during the audit period, Amanda Energy did not comply with all limitations when arranging for disconnection due to failure to pay a bill. It was noted that 3 out of the 4 of the arranged disconnections were non-compliant with respect to providing warnings in the manner and specified timeframes.	Although outside the scope of the audit period, the Licensee has implemented compliant automated billing timeframes (i.e. parameters defined in XERO) and amended the control procedure to reflect the requirement for written management approval prior to initiating formal disconnection proceedings after the first disconnection notice was sent (i.e. As defined in XERO in accordance with 7.1.1 a-c)An internal control process that is not reliant on an individual person could be considered. Resolution of process could include a detailed control procedure formally documenting management processes and compliance requirements, a disconnection form/checklist to formally document the decision, employee training, incorporation of compliance based requirements into job descriptions, and clear delegation of authority in the event the responsible person is not available. A review of the Licensee's activities, conducting a risk assessment and developing a risk management strategy for the mitigation of compliance based risks could be considered. Further consideration of the effectiveness of the automated dates parameters established in XERO is recommended to ensure	31/01/2022 No further action required

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
		Public holidays do not impact compliance moving forward.	
		<p>PAIP REF # 12/2021 - Update Control Procedure to include the following improvements:</p> <ul style="list-style-type: none"> - Clear identification of compliance requirements - A checklist to formally document the decisions and steps taken. - Review and if required update XERO parameters in the automated statements to ensure public holidays do not affect compliance. - Implement a delegation of authority policy. - Incorporate compliance requirements into job descriptions where required. - Develop a risk management strategy to mitigate compliance-based risks. 	
13/2021	<p>230 B 2 2022 Code of Conduct, CI 49(a) Amanda Energy did not comply with all limitations when arranging for disconnection due to failure to pay a bill. It was noted that on one occasion 7.2(1)(a) was breached as the Licensee arranged for the disconnection of a customer's supply address for failure to pay a bill within 1 business day after the expiry of the period referred to in the disconnection warning.</p>	<p>As for recommendation 12/2021</p> <p>PAIP REF # 13/2021 - As for recommendation 12/2021</p>	<p>31/01/2022</p> <p>No further action required</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
14/2021	<p>234 B 2 2022 Code of Conduct, CI 52</p> <p>The Licensee failed to differentiate between a query and complaint. As such non-compliance with 7.6(1)(a) as a complaint (as defined by the ERA Customer Complaint Guidelines - 2016) had been made to the retailer directly related to the reason for the proposed disconnection.</p>	<p>The non-compliance is in relation to the Licensee failing to differentiate between a query and a complaint. A review of the Complaints Handling process is required to ensure compliance with the Customer Complaint Guidelines – October 2016. Training could also be considered to assist customer service staff distinguish between a 'complaint' and 'enquiry and other communication (i.e. query). Aligning the Complaints Handling process and the Disconnection Procedure recommended for obligation 230 would be of benefit in ensuring consistency and compliance between the processes.</p>	<p>31/01/2022</p> <p>No further action required.</p>
15/2021	<p>280 A 2 2022 Code of Conduct, CI 73</p> <p>For the duration of the audit period, the Licensee did not provide customers at least once a year written details of their obligations to make payments to the customer under Part 14 of Code of Conduct nor did they include the amount of the payment and the eligibility criteria for the payment. Amanda Energy reported non-compliance with this obligation in the 2021 Compliance Report submitted on 31/08/21</p>	<p>The non-compliance was discovered during the internal compliance self-assessment for the 20/21 period and was reported to the ERA as required. The issue was rectified and has been scheduled in the billing system for every August Period (T4B) (note sample communicated sighted on 8/9/2021). As such, the Licensee has met the obligation for the 21/22 period.</p> <p>PAIP REF - NA</p>	<p>8/09/2021</p> <p>No further action required.</p>

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ¹ / Controls and Compliance Rating Legislation / Clause / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
16/2021	299 B 2 2022 Code of Conduct, CI 87(2) Amanda Energy's internal process for handling complaints and resolving disputes did not comply with AS ISO 10002-2014, specifically, the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA (Refer 302). Additionally, it was noted the Complaint Handling procedure did not specifically detail how Amanda Energy would handle complaints about the retailer, electricity marketing agents or marketing.	As for recommendation 12/2021	17/03/2022
		PAIP REF # 16/2021 - As for recommendation 14/2021	No further action required.
17/2021	302 B 2 2018 Code of Conduct, CI 12.2 The Licensee has not complied with the Customer Complaint Guidelines – October 2016 approved by the ERA. The obligation to comply with the guideline particularly in reference to the requirement for the Licensee to differentiate customer queries from complaints was not evidenced. Specifically in relation to the wrongful disconnection, payment of service standard payment and distinguishing between a query and	As for recommendation 12/2021	31/01/2022
		PAIP REF # 17/2021 - As for recommendation 14/2021	No further action required.

A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls		

a complaint as defined by AS ISO 10002-2014.

B 2021 Non-Compliance Unresolved During Current Audit Period

REFER ENCE (No./Ye ar)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	FURTHER ACTION REQUIRED DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls		

06/2021	<p>124</p> <p>B 2</p> <p>Retail Licence, condition 4.4.1</p> <p>During the audit period the Licensee complied with the dates for the submission of reporting requirements, however, non-compliance was noted in regard to late payment of prescribed fees and the failure to include the non-compliance in the subsequent annual compliance report. The Control Procedures in relation to the correct collection and handling of data that the Licensee supplies to ERA and/or compliance related activities were not adequate to ensure accurate and timely reporting of information to the ERA.</p>	<p>The Control Procedures in relation to the correct collection and handling of data that the Licensee supplies to ERA and/or compliance related activities are required to be developed in order to facilitate accurate and timely reporting of information to the ERA. Consideration could also be given to further developing control processes for training, internal audit, management review and change management processes to ensure ongoing compliance.</p> <p>PAIP REF # 06/2021 - Improve and update control procedure around collection and handling of data required to be supplied and reported to the ERA. Implement additional training specifically around payment of</p>	<p>Refer to 2023 recommendations for obligation 124.</p>
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A 2021 Non-Compliance Resolved During Current Audit Period

REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating <i>Legislation</i> / Clause / Details of Non-Compliance or Inadequacy of Controls	invoices from the ERA.	

¹ Refers to electricity retail licence obligation in the Electricity Compliance Reporting Manual 2020

APPENDIX 1- AMANDA ENERGY PERFORMANCE AUDIT

OCTOBER 2023

Table 11 - Performance Audit Findings

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
9 ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS				
6 Type [2]	Electricity Industry Customer Transfer Code, CI 3.2(2) - A retailer must submit a separate data request for each connection point, unless otherwise agreed.		<p>FINDING: The Licensee confirmed during the audit period, the Western Power Web Portal inherently enforced the requirement by permitting only one NMI per data request.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • 147.2 - Ordering Historical Meter Data in [REDACTED] • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was understood a data request for standing and historical data, had to reference both the NMI and its checksum. • Compliance was inherent in the Western Power Web Portal (Web Portal) design. • The Licensee confirmed there was no necessity for an alternative agreement between WP and AE to bypass the separate data request for each connection point requirement. 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	<ul style="list-style-type: none"> • The Licensee used its own [REDACTED] to undertake metre data requests and this model was understood to be linked to WP Web Portal and reflected its limitations.
	2023 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
7 Type [2]	Electricity Industry Customer Transfer Code, CI 3.4(1) - A retailer must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day, unless otherwise agreed.		<p>FINDING: The Licensee confirmed that during the audit period, the Pricing Risk Model [REDACTED] system was used to process meter data requests. [REDACTED] was linked to the WP Web Portal which restricts the number of requests to 100 per day and the Licensee was unable to exceed prescribed number of requests unless a request to do so was sought from WP.</p> <p>The Licensee confirmed that during the audit period, the maximum number of data requests, for standing data and historical consumption data, was required to be increased above the 100 requests per day limit.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • 147.2 - Ordering Historical Meter Data in [REDACTED] • [REDACTED] • Emails with WP RE Data Request and CTR Request Limit Increase <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Email communications with WP requesting Provide Meter Data (PMD) limits be temporarily increased were provided for review.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
8 Type [2]	Electricity Industry Customer Transfer Code, CI 3.5(3) - A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.		<p>FINDING: The Licensee confirmed during the audit period there were no instances where a customer's verifiable consent ceased to apply or was withdrawn by the customers before WP provided the historical consumption data.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Induction Manual (Compliance) (EM) v1.2 • Energy Data Consent Email Template • Energy Data Consent Forms_BLANK_v4 • 126.3 Western Power Customer Transfer Request • 81.2 Processing of VCF_s • VCF Summary Audit Period V 7.0 • VCF Summary from 1 July 2022 • AE011 -Marketing Agent Obligations (ERL) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Induction Manual referenced the requirement for Verifiable Consent 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
9 Type [2]	Electricity Industry Customer Transfer Code, CI 3.6(2) - A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a request for historical consumption data that has been subsequently withdrawn.		<p>FINDING: The Licensee confirmed that during the audit period, there were no withdrawn requests and as such no payments were made to WPN for work performed in relation to a request for historical consumption data.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The WP Portal recorded electronic notification to WP whether or not a Licensee withdrew a request for historical consumption data during the audit period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL			
16	Electricity Industry Customer Transfer Code, CI 3.9(1) - A retailer may only use data relating to a contestable customer to provide that customer with a quotation for the supply of electricity by the retailer; or to initiate a transfer of that customer.		<p>FINDING: The Licensee confirmed during the audit period, Amanda Energy only used data relating to a contestable customer for the purpose of offering electricity supply quotes or facilitating the customer's transfer.</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Induction Manual (Compliance) (EM) v1.2 • 126.3 Western Power Customer Transfer Request • Energy Data Consent Email Template • Energy Data Consent Forms_BLANK_v4 • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that the Licensee updated the induction manual and included a quiz and sign-off detail during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL			
17 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(2) - A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.		<p>FINDING: The Licensee confirmed during the audit period, there were no customers who requested that their historical consumption data not be aggregated for internal business development.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Induction Manual (Compliance) (EM) v1.2 • 126.3 Western Power Customer Transfer Request • [REDACTED]

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Energy Data Consent Email Template • Energy Data Consent Forms_BLANK_v4 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No formal Control Procedures were developed in relation to aggregation of a contestable customer’s historical consumption data. • It was noted that the Licensee was a small organisation and awareness to compliance with requirement was confirmed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL		
18 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(3) - A retailer must not disclose a contestable customer’s data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.		<p>FINDING: The Licensee confirmed during the audit period, no contestable customer data has been provided to any other person without written consent, other than those defined in 3.9(3)(a)(i).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • Privacy Policy • Compliance Breaches Register v1.1 <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's Privacy Policy was available on their website and referenced this obligation. • The compliance breach register reflected an accidental order of data in [REDACTED] on 22/2/2022. The error was identified, and the data was confirmed as not being provided to a third party.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		
19	Electricity Industry Customer Transfer Code, CI 3.9(4) - A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.		<p>FINDING: The Licensee confirmed during the audit period, upon receiving verifiable consent from a contestable customer, Amanda Energy's policies and procedures obligated them to retain this consent on record for a period of two years. This retention policy applied to consent related to the Licensee's request for the customer's historical consumption data and any subsequent disclosure of this data to third parties, as per clause 3.9(3).</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Induction Manual (Compliance) (EM) v1.2 • VCF Summary Audit Edition V 7.0 • VCF Summary from 1 July 2022 • Induction Manual (Compliance) (EM) v1.2 • Energy Data Consent Email Template • Energy Data Consent Forms_BLANK_v4 • 126.3 Western Power Customer Transfer Request • 81.2 Processing of VCF_s • VCF Summary Audit Period V 7.0 • VCF Summary from 1 July 2022 • AE011 -Marketing Agent Obligations (ERL) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee’s Control Procedures confirmed that electronic copies of VCF’s were maintained indefinitely. There were external drives for data security. The retention policy was not to delete any information. • The Office & Finance Manager confirmed awareness to the requirements in relation to verifiable consent.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL		
23 Type [2]	Electricity Industry Customer Transfer Code, CI 4.2(2) - A retailer must submit a separate customer transfer request for each connection point, unless otherwise agreed.		<p>FINDING: The Licensee confirmed during the audit period, Customer Transfers Requests (CTRs) were facilitated by the Western Power Portal. Compliance with this requirement was inherent in the design of the portal which constrained customer transfer requests to single requests for connection points. The portal did not allow transfer requests for more than one NMI at a time.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 126.3 Western Power Customer Transfer Request • 44.1 Transfer Email Templates • 27.9 New Client Transfer Amanda Energy (EM) • WP Web Portal Export - All CTRs <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed there was no necessity for an alternative agreement between WP and AE to bypass the separate customer transfer request for each connection point requirement.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
24 Type [2]	Electricity Industry Customer Transfer Code, CI 4.3 - A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer that submitted the customer transfer request or to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed during the audit period, compliance with requirement was inherent in the portal design. All transfers were conducted via the portal. The portal provided for transfer reasons of either “Erroneous Transfer” or “New Customer Transfer” and requires that one of them be checked as a condition of acceptance.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • WP Web Portal • 126.3 Western Power Customer Transfer Request • 27.9 New Client Transfer Amanda Energy (EM) • WP Web Portal Export - All CTRs • WP Build Pack <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Western Australian Electricity Market Build Pack - Customer Transfer and Standing Data <p>Procedure specified requirements in relation to reasons for transfer.</p>
	PRIORITY - 4	CONTROLS RATING - NP	
2023 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
25 Type [2]	Electricity Industry Customer Transfer Code, CI 4.4(1) - A retailer may only submit a customer transfer request if it has an access contract for the network unless it is to reverse an erroneous transfer.	<p>FINDING: The Licensee confirmed during the audit period, Amanda Energy had a valid ETAC with Western Power for the duration of the audit period.</p> <p>It was noted Web Portal access was facilitated by WPN and CTR process as described in the Build Pack Procedure for Customer Transfer and Standing Data request had auto validation features for when the CTR did not specify a valid access contract, applicable to the incoming retailer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 126.3 Western Power Customer Transfer Request • 27.9 New Client Transfer Amanda Energy (EM) • WP Web Portal Export - All CTRs • WP Build Pack • 2018.09.26 ETAC Second Deed of Amendment Signed • 2023.08.14 ETAC Amanda Energy [Signed] • Signed ETAC - Amanda Energy Pty Ltd 31 10 2013 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The initial ETAC expired on the 31/10/2023.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	• WP and AE re-signed another ETAC for a 5 year period on 14/8/2023 with a further option of 5 years.
	2023 - NIL			
26 Type [2]	Electricity Industry Customer Transfer Code, CI 4.4(2) - A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.			<p>FINDING: The Licensee confirmed that during the audit period there were 26 instances where the Licensee submitted a CTR to reverse an erroneous transfer. A sample of the erroneous transfers indicated that they were resultant from either another retailer initiating CTR while the customer was still under contract or Amanda Energy initiating CTR while the customer was under contract.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - All Erroneous CTRs • 171.0 - Submitting an Erroneous Customer Transfer <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The process to confirm the identity of the incoming retailer is managed by WPN through the Web Portal via a customer transfer notification (CTN). It was noted that a notice of Erroneous Transfer informs Western Power to restore the customer to its original retailer. • It was noted that the Licensee had developed a control procedure during the current audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL	
27 Type [2]	Electricity Industry Customer Transfer Code, CI 4.5(1) - A retailer must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date, unless otherwise agreed.	<p>FINDING: The Licensee confirmed that during the audit period, all transfers were requested electronically via the Western Power Web Portal, accessible via the internet. Compliance was inherent in the Web Portal design as it constrained the number of transfers to less than the prescribed number. The portal limits customer transfers to the prescribed limit of 20, which limit also applies to transfers with the same nominated transfer date.</p> <p>The Licensee confirmed that during the audit period, the maximum number of data requests, for standing data and historical consumption data, was required to be increased above the 20 per day transfer request limit.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 27.9 New Client Transfer Amanda Energy (EM) • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) • 126.3 Western Power Customer Transfer Request <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	• Email communications with WP requesting Provide Meter Data (PMD) limits be temporarily increased were provided for review.
	2023 - NIL 27			
28 Type [2]	Electricity Industry Customer Transfer Code, CI 4.6(3) - A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.			<p>FINDING: The Licensee confirmed that during the audit period, no CTRs were withdrawn because verifiable consent ceased to apply. Customer Transfer Requests were only submitted after an Electricity Supply Agreement was signed, witnessed, and countersigned.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 27.9 New Client Transfer Amanda Energy (EM) • Energy Data Consent Email Template • Energy Data Consent Forms_BLANK_v4 • 81.2 Processing of VCF_s • VCF Summary Audit Period V 7.0 • VCF Summary from 1 July 2022 • 126.3 Western Power Customer Transfer Request <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee has developed control procedures for the CTR process. • Sample of ESA's and transfer dates were reviewed. • The Office & Finance Manager commenced employment during the audit period and confirmed their understanding of the verifiable consent requirements.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 28		
29*Δ	Electricity Industry Customer Transfer Code, CI 4.7 - A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, the requirements in relation to the nominated transfer dates were not met. A review of all customer transfers and the Compliance Breach Register indicated that there were 13 CTRs rejected due to "Transfer Date" non-compliances for the period 21/09/2021 to 8/12/2022.</p> <p>The previous audit identified obligation 29 non-compliant and the Licensee had further developed and revised the control procedure (refer PAIP 2020 Performance Audit).</p> <p>The Licensee's internal review processes were notably improved since the previous audit and as a result of an internal audit process a further control in the development of a spreadsheet tool to confirm the minimum lead-time calculator for CTRs. The tool was effective in preventing further non-compliances for the audit period 9 December 2022 to 31 August 2023.</p> <p>It was noted that the non-compliances were included in the 2022 and 2023 annual compliance reports required during the audit period.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 27.9 New Client Transfer Amanda Energy (EM) • 126.3 Western Power Customer Transfer Request • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) • WP Web Portal • WP Web Portal Export - All CTRs • Compliance Breaches Register v1.1 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that on the majority of occasions the requirements with regard to the transfer date referenced in clause 4.7 were met. However, it was noted by the Licensee these non-compliances with the mandated transfer process, could potentially leading to operational inefficiencies and customer dissatisfaction. • The Licensee included the breach in the subsequent annual compliance reports (i.e. 2022 and 2023). • The Licensee confirmed communication with WPN to reschedule rejected transfer dates. • The Min Lead Timeframe Calculator was valid for 2022 - 2024 dates accounting for state and national public holidays and has been effective in preventing non-compliance. It was noted that this tool will need to be revised for the year 2025 and beyond.
	PRIORITY - 3	CONTROLS RATING - A	COMPLIANCE RATING - 2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	<p>01/2023 RECOMMENDATION - The Licensee's control procedures were improved following the 2021 Performance Audit, and this was demonstrated with the revision of the control procedure, internal audits identifying the non-compliances, recording in the compliance breach register and the development of the Min Lead Timeframe Calculator).</p> <p>Additional, non-compliances were identified during the 2023 audit period and subsequently lead to the Licensee developing an excel spreadsheet for further process control (refer 175.1 - Min Lead Timeframe Calculator (2022 - 2024)). It is the auditor's opinion that the current control processes are adequate to ensure ongoing compliance with requirements of obligation 29. Compliance was noted for the period 9 December 2022 to 31 August 2023. There are no further recommendations in relation to obligation 29.</p>	
30 Type [2]	<p>Electricity Industry Customer Transfer Code, Cl 4.8(2) - A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.</p>	<p>FINDING: During the audit period the Licensee confirmed, Amanda Energy paid all costs incurred by Western Power, as the network operator, for providing and/or installing a meter including if a CTR was withdrawn.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - All CTRs • 126.3 Western Power Customer Transfer Request • 27.9 New Client Transfer Amanda Energy • Monthly Summary Western Power Costs - Amanda Energy June 23 • Western Power Costs - Non-Energy Invoice - Extended Metering Services -June 23 • Payment Confirmation Wp Western Power Costs - Non-Energy Invoice - June 23 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee confirmed non-energy invoices have been paid where they were incurred for providing and/or installing a meter if a customer transfer request is withdrawn. Sample invoices were provided. It was noted the licensee tracks WP Cost Monthly in a spreadsheet. The report groups extended metering services costs and it does not specifically detail costs attributable to the withdrawal of a CTR.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 30			
34 Type [2]	Electricity Industry Customer Transfer Code, CI 4.9(6) - A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.			<p>FINDING: The Licensee confirmed that during the audit period, on the occasions where Western Power and the Amanda Energy had to agree to a revised nominated transfer date, the parties made reasonable endeavours to resolve with the Licensee any potential grounds for objection prior to objecting to the CTR, as such an agreement for a revised nominated transfer date was achieved.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal 27.9 New Client Transfer Amanda Energy (EM) 175.1 - Min Lead Timeframe Calculator (2022 - 2024) 126.3 Western Power Customer Transfer Request 2023.08.14 ETAC Amanda Energy [Signed] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All objections by Western Power communicated through the web portal notifications, were readily resolved during the audit period. • The Licensee detailed the process for communication between both parties to agree to a revised nominated transfer date.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 34		
37A.+ Type [2]	Electricity Industry Customer Transfer Code, Cl 4.10(4) - If a current retailer receives a notice under clause 4.10(1)(a) or 4.10(2)(c) in circumstances where clause 4.12(1)(a)(ii) applies, then the current retailer must promptly forward the notice to the other person referred to in clause 4.12(1)(a)(ii).		<p>FINDING: The Licensee confirmed that during the audit period, in relation to Western Power's obligations following receipt of a valid CTR, Amanda Energy and Western Power agreed to revise the nominated transfer dates in the certain circumstances specified.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 27.9 New Client Transfer Amanda Energy (EM) • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) • 126.3 Western Power Customer Transfer Request • 2023.08.14 ETAC Amanda Energy [Signed] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	• Communication processes established electronically through the Web Portal and email communication with Western Power.
	2023 - NIL 37A.			
39 Type [2]	Electricity Industry Customer Transfer Code, CI 4.11(3) - A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.			<p>FINDING: The Licensee confirmed that during the audit period, accepted all Western Power's reasonable endeavours to set a new nominated transfer date which was as close as practicable to the original nominated transfer date.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 126.3 Western Power Customer Transfer Request • WP Web Portal • 27.9 New Client Transfer Amanda Energy (EM) • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) • 126.3 Western Power Customer Transfer Request • 2023.08.14 ETAC Amanda Energy [Signed] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Actual values were obtained for all meters before the nominated transfer date occurred. • It was understood it was not practicable for the meter to be not read as contestable meters stored data for 95 days and were usually read remotely. • It was noted that any Type 6 meters Amanda Energy nominated to transfer must have had a meter change and meter read before transfer can occur.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 39			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
40 Type [NR]	Electricity Industry Customer Transfer Code, CI 4.12(3) - The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.		<p>FINDING: The Licensee confirmed that during the audit period, Western Power re-executed an ETAC with Amanda Energy.</p> <p>It was understood this was as the ETAC expired and was not to accommodate any necessary amendments to the access contract consequential to the amendments made by clause 4.12(1) or clause 4.12(2).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 2018.09.26 ETAC Second Deed of Amendment Signed • 2023.08.14 ETAC Amanda Energy [Signed] • Signed ETAC - Amanda Energy Pty Ltd 31 10 2013 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Note: The intention of this clause 4.12 is to— - provide a mechanism for the connection points specified in a retailer’s access contract to be automatically updated to accommodate a transfer; and - override any provisions in a retailer’s access contract which act to hinder or frustrate the transfer or are otherwise inconsistent with the objectives of this Code; and - allow other provisions in a retailer’s access contract which relate to the addition or removal of connection points to apply so long as these do not act to hinder or frustrate the transfer.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 40			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
43 Type [NR]	Electricity Industry Customer Transfer Code, CI 4.15 - In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and, if applicable, AEMO) must act in good faith to ensure that the affected contestable customer has the same rights and obligations as if the erroneous transfer had not occurred.		<p>FINDING: The Licensee confirmed that during the audit period, with respect to rectifying an erroneous transfer, all interested parties acted in good faith to ensure that the affected contestable customer had the same rights and obligations as if the erroneous transfer had not occurred.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 171.0 - Submitting an Erroneous Customer Transfer • WP Web Portal Export - All Erroneous CTRs <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that during the current audit period the licensee developed documented control procedures in relation to erroneous transfers. • An export from the Web Portal of all erroneous transfers was provided for review. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL 43			
44	Electricity Industry Customer Transfer Code, CI 4.16 - A verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request must be retained by the incoming retailer for two years, except in the case of a customer transfer request to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, control procedures confirmed that electronic copies of verifiable consent were maintained for the required 2-year period.</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 27.9 New Client Transfer Amanda Energy (EM) • 126.3 Western Power Customer Transfer Request • 81.2 Processing of VCF_s • VCF Summary Audit Period V 7.0 • VCF Summary from 1 July 2022 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that the verifiable consent given by a contestable customer for a CTR was evident as the customers signed ESA. • There were external drives for data security. The retention policy was understood to be to not to delete any information.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 44		
45 Type [2]	Electricity Industry Customer Transfer Code, CI 4.17 - A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where customers were billed for charges after the transfer date.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed]

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was understood there were no instances where an erroneous transfer required Amanda Energy as the previous retailer to bill a contestable customer for charges incurred after the transfer time
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	<ul style="list-style-type: none"> • Invoicing was based on meter data provided through the Web Portal. Protocols related to the Web Portal would result in meter data not being available for the licensee to bill a customer after the transfer time.
	2023 - NIL 45			
48” Type [2]	Electricity Industry Customer Transfer Code, CI 5.2 - A network’s communication rules apply in respect of data and information communication between the network operator and a retailer under this Code.			<p>FINDING: The Licensee confirmed that during the audit period, that all customer transfer communication was undertaken in accordance with Metering Code’s communication rules. Specifically, through the functions of the via the Web Portal (i.e., all meter data and customer information were primarily managed electronically through portal notifications).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The “communication rules” incorporate and largely comprise the suite of technical documents known as the “Build Pack” During the audit the Build Pack was accessible on Western Power website as the following https://www.westernpower.com.au/industry/manuals-guides-standards/build-pack/
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 48		
48A. Type [2]	Electricity Industry Customer Transfer Code, Cl 6.1 - All notices must be in writing and delivered as described in subclauses 6.1(a)-(c).		<p>FINDING: The Licensee confirmed that during the audit period, in all instances where communication with Western Power was intended to be a recognised as a valid notice, then the notice or other communication of information was via means as described in subclauses 6.1(a)-(c). General queries and communication with Western Power Liaison contact routinely via email or telephone.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal WP Build Pack 2023.08.14 ETAC Amanda Energy [Signed] 2018.09.26 ETAC Second Deed of Amendment Signed <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the Customer Transfer Code defined notice as a notice or other communication in writing under Part 6 and included a data request or a CTR.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 48A.		
49 Type [2]	Electricity Industry Customer Transfer Code, CI 6.2 - A licensee's notice in relation to a data request or customer transfer request must identify the connection point to which it relates.		<p>FINDING: The Licensee confirmed that during the audit period, notices in relation to a data request or customer transfer request identified the connection point.</p> <p>All transfers and data transactions were done electronically via the Web Portal which used the National Meter Identifier or NMI as a distinct and universal identifier or code for each connection point in the electricity market.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal WP Build Pack 2023.08.14 ETAC Amanda Energy [Signed] 2018.09.26 ETAC Second Deed of Amendment Signed 126.3 Western Power Customer Transfer Request <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The NMI was noted in the Build Pack procedures specified NMI as a mandatory field and included validation processes to ensure the correct NMI was referenced (i.e. NMI and NMI checksum)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 49			
52 Type [2]	Electricity Industry Customer Transfer Code, CI 6.4(1) - A retailer must notify its contact details to a network operator within three business days of a request.			<p>FINDING: The Licensee confirmed that during the audit period, confirmed that during the audit period the Western Power did not make a request for the Amanda Energy to notify its contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The ETAC was re-executed during the audit period and contact details were included as part of this renegotiation process.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 52			
53 Type [2]	Electricity Industry Customer Transfer Code, CI 6.4(2) - A retailer must notify the network operator of any change in its contact details at least three business days before the change takes effect.			<p>FINDING: The Licensee confirmed that during the audit period, there were no changes to Amanda Energy's contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WIP - Internal Compliance Manual - MASTER (EM) • WP Web Portal

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 53		
54 Type [2]	Electricity Industry Customer Transfer Code, CI 6.6 - A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with the communication rules.		FINDING: The Licensee confirmed that during the audit period, use of the Western Power portal meets the requirements of the communication rules. DOCUMENTS/SYSTEMS: • WP Web Portal • WP Build Pack PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • All transfers and data transactions were done electronically via the portal. Other communications are by email to the correct addresses.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 54		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
55 Type [NR]	Electricity Industry Customer Transfer Code, CI 7.1(1) - For a dispute in respect of a matter under, or in connection with, the Electricity Industry Customer Transfer Code, the disputing parties must meet, within five business days of a request by one of those parties and attempt to resolve the dispute through negotiations that are conducted in good faith.		FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not engage in dispute with regards to the Customer Transfer Code. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed • WIP - Internal Compliance Manual - MASTER (EM) PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • Dispute resolution processes were defined in the ETAC and the Customer Transfer Code. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 55			
56	Electricity Industry Customer Transfer Code, CI 7.1(2) - If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute through negotiations that are conducted in good faith.		FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not engage in dispute with regards to the Customer Transfer Code.	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [NR]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Reference to the compliance requirements i.e. 10 business days were referenced in the Internal Compliance Manual.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 56			
57 Type [2]	Electricity Industry Customer Transfer Code, CI 7.1(3) - If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not engage in dispute with regards to the Customer Transfer Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 57		
58 Type [2]	Electricity Industry Customer Transfer Code, CI 7.2(4) - A disputing party that refers a dispute to the arbitrator must provide the arbitrator with prescribed details of the nature of the dispute.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not engage in dispute with regards to the Customer Transfer Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal 2023.08.14 ETAC Amanda Energy [Signed] 2018.09.26 ETAC Second Deed of Amendment Signed WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 58		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
59 Type [NR]	Electricity Industry Customer Transfer Code, CI 7.3(2) - A disputing party must, at all times, conduct itself in a manner that is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not engage in dispute with regards to the Customer Transfer Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 59			
11. ELECTRICITY INDUSTRY (CUSTOMER CONTRACTS) REGULATIONS – LICENCE CONDITIONS AND OBLIGATIONS			
79	Electricity Industry (Customer Contracts) Regulations, Reg 5 - A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy used a Non-Standard Form Contract (NSFC), which comprised the NSFC Terms & Conditions and an ESA SUC (Electricity Supply Agreement for Small Use Customers) during the audit period, with the exception of a new tenant situation. The NSFC & ESA were expressed in clear, simple, and concise language. The NSFC used italics to highlight all terms defined in the list of definitions. The use of italics improved emphasis of key terms for the reader</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • ESA GSA Master Contracts Register v1 • ESA SUC NSFC Agreement (Versions February & August 2023) • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • ESA SUC and NSFC contracts were sampled throughout the audit period. • All versions of the ESA SUC and NSFC during the audit period were reviewed for compliance. • It was noted there were no customer complaints regards ESAs during the audit period. • It was noted NSFC versions 1.4-1.6 were applicable to the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 79		
80 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 6 - A non-standard contract must specify when it comes into effect and the period for which it has effect.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC Customer Schedule (page 1) outlined the commencement date and the minimum supply period. Both of these terms are then defined within the ESA terms and conditions (T&Cs).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 80		
81 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 7 - A non-standard contract must specify certain information about the retailer.		<p>FINDING: The Licensee confirmed that during the audit period, versions of ESA SUC and non-standard contract T&Cs contained the following information as required:</p> <ul style="list-style-type: none"> (a) company name and business name; (b) Australian Business Number; (c) registered office address and business address; (d) postal address; (e) telephone number; (f) email address; and (g) internet website address. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 81			
82 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 8 - A non-standard contract must give an exact description of the goods and services that the retailer will provide under the contract.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs detailed an exact description of goods and services that the Licensee provided under the contract.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 82			
83 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 9 - A non-standard contract must require the customer to pay for electricity supplied under the contract.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC required the customer to pay for electricity supplied under the contract.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 83			
84	Electricity Industry (Customer Contracts) Regulations, Reg 10 - A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs included provisions to prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 84			
85 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs described the circumstances under which Amanda Energy had the right to disconnect and was required to reconnect supply.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> All versions of the ESA SUC and NSFC during the audit period were reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 85		
86	Electricity Industry (Customer Contracts) Regulations, Reg 12 - A non-standard contract must require the retailer to deal with security deposits and the payment of interest in the manner that is specified.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs outlined the circumstances in which a security deposit would be required, how it would be kept and identified accounting records. Reference to the payment of accrued interest was also referenced.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) ESA SUC NSFC Agreement (Versions February & August 2023) 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions ██████ <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> All versions of the ESA SUC and NSFC during the audit period were reviewed.
Type []	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 86		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
86A+* Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs did not provide for a benefit change and as such were not required to include the statements in the NSFC.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Notes that the Licensee incorrectly reported the new obligation as applicable from 01/01/2023 as breach in the 2023 Annual Compliance Report. • It was noted that compliance with regulation 12 only eventuates "if" a benefit change is provided for in the non-standard form contract. • No customers were signed on to an agreement between 01/01/2023-31/8/2023 that would have been impacted by a benefit change.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 86A			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
87*	Electricity Industry (Customer Contracts) Regulations, Reg 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 prices information.		<p>FINDING: The Licensee confirmed that during the audit period 01/01/20 to 31/8/2023, Amanda Energy's non-standard form contract did not comply with clause 13(2)(a) and (b) of the Electricity Industry (Customer Contracts) Regulations 2005 (amendment regulations came into effect on 01/01/2023).</p> <p>It was noted Amanda Energy updated their non-standard form contracts effective 21/02/2023, ensuring compliance with this clause.</p> <p>In an effort to improve the control environment, it was noted the Licensee engaged external legal firms to assist with contract updates.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted 2x customers were signed in early January 2023 which the prices on non-compliant contract terms. • The Licensee report a breach of obligation 87 in the 2023 Annual Compliance Report. • It was noted the Licensee engaged external legal firms to assist with contract updates.
Type [2]	PRIORITY - 4	CONTROLS RATING - A	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	<p>02/2023 RECOMMENDATION: The Licensee updated their non-standard form contracts effective 21/02/2023, ensuring compliance with this clause 13(2)13(2)(a) and (b) of the Electricity Industry (Customer Contracts) Regulations 2005 as amended. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p>		
88 Type [2]	<p>Electricity Industry (Customer Contracts) Regulations, Reg 14 - A non-standard contract must describe the procedures to be followed by the retailer in relation to the preparation, issue, and review of customer bills.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs described the procedures followed by Amanda Energy in relation to the preparation, issue and review of the customer's bills.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All versions of the ESA SUC and NSFC during the audit period were reviewed. For example, Feb 2023 refer section 7.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 88			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
89*Δ Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 15 - A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.	<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs described the matters relating to the termination of the contract that are specified in the regulation.</p> <p>Specifically noted as compliant obligations; 15.2(ca) in relation to circumstances where the customer consumes more than 160 MWh of electricity in any period of 12 months; and 15.1(b) deal with the procedures for and in relation to termination of the contract.</p> <p>Verification of compliance was noted in version 1.4 ESA-SUC T&Cs (refer clause 2.4).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee report a breach of obligation 89 in the 2022 Annual Compliance Report. • It was noted that the Licensee updated the NSFC T&Cs to include all compliance requirements with this Regulation and generated an email to customers notifying them of the recent changes. This communication was sent on the 8/10/2021. • All versions of the ESA SUC and NSFC during the audit period were reviewed. For example, Feb 2023 refer section 2.4 • It was understood the Licensee engaged external legal firms to assist with contract updates.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 3	CONTROLS RATING - A	COMPLIANCE RATING - 2	
	03/2023 RECOMMENDATION: The Licensee updated their non-standard form contracts effective 8/10/2021, ensuring compliance with this regulation. Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.			
90*Δ	<p>Electricity Industry (Customer Contracts) Regulations, Reg 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.</p> <p>The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p>			<p>FINDING: The Licensee updated their non-standard form contracts throughout the audit period to reflect the requirements of regulation 16 and it was confirmed that the Licensee was compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) and (2) for the applicable period effective from 8/10/2021 to 01/01/2023; and • Regulation 16(1) (1A) from 21/02/2023 to 31/8/2023. <p>It was noted that the Licensee was non-compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) (1A) for the period 01/01/2023 to 20/02/23. This was due to the requirements of amendment regulations not being incorporated into the NSFC until 21/02/2023. • Regulation 34 was non-compliant for the applicable period effective from 01/01/2023 to 31/8/2023, as the changes made to the contracts were not communicated to the customers as required,

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]		<p>Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates. No further recommendations are made.</p> <p>It was noted compliance with regulation 16 for the SFC was applicable to the full audit period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • Amanda Energy - Standard Form Contract v1.2 • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted 2x customers were signed in early January 2023 which the prices on non-compliant contract terms. • The Licensee report a breach of obligation 90 in the 2022 and 2023 Annual Compliance Reports. • It was noted the Licensee engaged external legal firms to assist with contract updates. • It was noted that the Licensee updated the NSFC to included compliance requirements with these Regulations and generated an email to customers notifying them of the recent changes as per the updated NFSC. This communication was sent on the 8/10/2021. • Verification of compliance was noted in versions 1.4 and 1.5 ESA-SUC NSFC T&Cs (refer clause 19). • Compliance with this obligation was reported in the 2022 Annual compliance Report as effective from 08/10/2021.
	PRIORITY - 3	CONTROLS RATING - B	COMPLIANCE RATING - 2
	<p>04/2023 RECOMMENDATION: The Licensee updated their non-standard form contracts throughout the audit period to reflect the requirements of regulation 16 and it was confirmed that the Licensee was compliant with:</p> <ul style="list-style-type: none"> • Regulation 16(1) and (2) for the applicable period effective from 8/10/2021 to 01/01/2023. • Regulation 16 (1A) was compliant for the applicable period effective from 21/02/2023 to 31/8/2023. <p>Additionally, it was noted the Licensee engaged external legal firms to assist with contract updates.</p> <p>However, the Licensee has not formally communicated the changes to the customers as required by Regulation 34. It is recommended that the Licensee request the changes to be highlighted by the legal advisors and that this highlighted document is then forwarded to the customers in order to comply with Regulation 34.</p>		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
91 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 17 - A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.		FINDING: The Licensee confirmed that for the duration of the audit period, non-standard form contract specified Amanda Energy's rights and obligations, including assignment without the customer's consent. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	
2023 - NIL 91			
92 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 18 - A non-standard contract must describe the procedures that must be followed by the retailer in responding to a complaint made by a customer.		FINDING: The Licensee confirmed that for the duration of the audit period, non-standard form contract detailed their complaints handling procedures and the subsequent escalation processes available to the customer. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • The NFSC specifically referred to management of complaints in accordance with Australian Standard on Complaints Handling (AS/NZS 10002:2014).
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - 1	
	2023 - NIL 92		
93 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 19 - A non-standard contract 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.		FINDING: Although the Licensee reported non-compliance with obligation 93 in the 2023 Annual Compliance Report, it was confirmed that for the duration of the audit period, non-standard form contract detailed Amanda Energy’s management of customer information in accordance with the Privacy Act 1988 (Cth) and their Privacy Policy. The NFSC otherwise specified compliance with all relevant privacy legislation in relation to the customer’s personal information. The requirements of regulation 19(2)(a) and (b) were also noted to be compliant for the duration of the audit period. DOCUMENTS/SYSTEMS: • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • ██████████ • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: <ul style="list-style-type: none"> The Licensee reported non-compliance with obligation 93 in the 2023 Annual Compliance Report. It was noted the Privacy Policy on the Amanda Energy website was valid from August 2017. NSFC reviewed reflected compliance with the requirements following the amendments.
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - 1	
2023 - NIL 93			
94 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 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.		FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs specified governance by the laws of the state Western Australia, 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 DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> ESA SUC NSFC Agreement applicable to audit period. Amanda Energy website Privacy Policy █ 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> NIL

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 94			
95 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 21 - A non-standard contract must not include a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs did not contain a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • [REDACTED] • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 95			
96	Electricity Industry (Customer Contracts) Regulations, Reg 32 - A non-standard contract must include details about the cooling off period specified in the regulation.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs included details about the cooling off period as specified by the regulation and other required refer section of NFSC on unsolicited consumer agreement.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • [REDACTED] • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 96			
97 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 93(2) - A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's ESA-SUC T&Cs included a provision for the customer to terminate the contract at any time with no less than 5 days' notice.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • [REDACTED] • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 97		
98 Type [2]	Electricity Industry (Customer Contracts) Regulations, Regs 93(3) and (4) - A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.		FINDING: The Licensee confirmed that during the audit period, Amanda Energy's NSFC described the requirement that a fixed term contract must authorise the customer to terminate the contract at any time by giving notice to the retailer not less than 20 days before the day on which the customer wants the contract to end. Additionally, it specified amount the payable by the customer, by way of penalty, in the event that the customer terminated the contract before the expiry of the term of the contract. It was noted, the Licensee has updated the NSFC to include compliance requirements with these Regulations. as reported in the 2022 Annual Compliance Report compliance was confirmed from 1/9/2021. DOCUMENTS/SYSTEMS: • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • ██████████ • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • Welcome Pack v1.1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee report a breach of obligation 98 in the 2022 Annual Compliance Report. It was noted that the Licensee updated the NSFC T&Cs to include all compliance requirements with this Regulation. It was understood the Licensee engaged external legal firms to assist with contract updates. The Licensee confirmed the change to the contract requirements were communicated to the customers on 08/10/2021.
	PRIORITY - 3	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 98		
98A	Electricity Industry (Customer Contracts) Regulations, Reg 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34A of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 19.2) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee report a breach of obligation 98A in the 2023 Annual Compliance Report. • It was noted that the Licensee updated the NSFC T&Cs to include all compliance requirements with this Regulation. • Compliance was confirmed from 21/2/2023.to 31/8/2023. • It was understood the Licensee engaged external legal firms to assist with contract updates.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 2
<p>05/2023 RECOMMENDATION: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34A of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 19.2) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
98C Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 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.	<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34C of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 20) and were noted to have been compliant as of 21/02/2023. Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions • [REDACTED] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee report a breach of obligation 98C in the 2023 Annual Compliance Report. • It was noted that the Licensee updated the NSFC T&Cs to include all compliance requirements with this Regulation. • Compliance was confirmed from 21/2/2023.to 31/8/2023.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> It was understood the Licensee engaged external legal firms to assist with contract updates.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 2
	<p>06/2023 RECOMMENDATION: The Licensee confirmed that during the audit period, Amanda Energy's non-standard form contract did not include an appropriate clause to comply with this obligation 34C of the Electricity Industry (Customer Contracts) Regulations 2005, which came into effect 01/01/2023.</p> <p>The Licensee confirmed compliance with the requirement in the 2023 Annual Compliance Report. A review of the Licensee's February NSFC reflected the requirements of regulation 16(1 A) (refer NSFC clause 20) and were noted to have been compliant as of 21/02/2023.</p> <p>Additionally, it was understood the Licensee engaged external legal firms to assist with contract updates. As such no further recommendations were made in relation to the Licensee's compliance control environment.</p>		
100	Electricity Industry (Customer Contracts) Regulations, Reg 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.		<p>FINDING: The Licensee confirmed that during the audit period, no customers were supplied under the SFC.</p> <p>Additionally, with the respect to new tenants who had not yet entered a NSFC with Amanda Energy, there were no customers who commenced to take a supply of electricity at premises without entering into a contract for the supply with the Licensee.</p> <p>In the one situation where a tenant moved out of a premise and there was a period of supply before the new tenant entered a NSFC, the Licensee did not bill the landlord for the interim period.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • 163.5– Re-Sign (New Tenant) Procedure • 149.0 New Tenant - Standard Form Contract Information • Re: Electricity Supply - UG1 334 Cambridge St, Wembley - Obligation 100 • NEW TENANT - FORMAL - Standard Form Contract (SFC) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Control Procedure 149.0 New Tenant - Standard Form Contract Information reflected the requirement. • Email template for new tenants established • As such, the electricity that should have been deemed to be supplied under the standard form contract of the Amanda Energy for the connection point in respect of those premises, was not actually billed to the customer. • It was confirmed by the Licensee that the invoice records verified the non-supply under SFC for the connection point in respect of those premises (i.e. NMI not billed as SFC).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 100			
12. ELECTRICITY INDUSTRY ACTION – LICENCE CONDITIONS AND OBLIGATIONS			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
101 Type [2]	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).		<p>FINDING: The previous Performance Audit report was provided to the ERA in 2021 for the audit period of 48 months from 1 September 2017 to 31 August 2021. This performance audit for the period from 1 September 2021 to 31 August 2023 was initiated in accordance with the ERA’s Audit Guidelines. The auditor was approved by the ERA.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Corporate Outlook Calendar <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Notice published on the ERA website 28 January 2022.
	PRIORITY - 4	CONTROLS RATING - NP	
2023 - NIL 101			
105	Economic Reg Authority (Licensing Funding) Regs 2014 - A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in March 2022 relating to standing data charges that was paid 1 days overdue. The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The Office & Finance Manager confirmed the controls in relation payments.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Corporate Outlook Calendar • AE003 - Paying ERA Invoices • AMANDA_ENERGY_SOLUTIONS_-_Approved_and_paid • RE_ Payment of Economic Regulation Authority Invoices <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted all other invoices were paid within the payment terms for the duration of the audit period. • The Licensee has established a shared compliance calendar in outlook. • It was noted that the late payment of this fee was not included in the 2022 Annual Compliance Report to the ERA refer obligation 124 for detail. • A report of payments was provided by the Licensee.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 2
<p>07/2023 RECOMMENDATION: The Licensee confirmed that during the audit period, Amanda Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in March 2022 relating to standing data charges that was paid 1 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The Office & Finance Manager confirmed the controls in relation payments, i.e., corporate outlook calendar. The non-compliance was administrative and had not material effect on customers or third parties. As such, no recommendation is made.</p>			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
106 Type [NR]	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, emergency, potential danger or other unavoidable cause.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy had limited capacity to minimize the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. Western Power as the Network provider fulfil this obligation.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • ESA SUC NSFC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • In the event of a power interruption the Licensee refers the Customer to the Western Power outages website. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL 106			
107 Type [2]	Electricity Industry Act, section 41(6) - A licensee must pay the costs of taking an interest in land or an easement over land.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy did not have any interests or easements in respect of land held by a public authority.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • NIL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	• NIL
	2023 - NIL 107			
108 Type [2]	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.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy's control procedures ensured that all new contracts processed were checked for small-use compliance prior to processing.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • ESA SUC NSFC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that during the audit period the expertise of legal advisors was sought in relation to the non-standard contract.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 108			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
109 Type [2]	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.		<p>FINDING: The Licensee confirmed that during the audit period of the audit period, Amanda Energy reviewed its standard form contract and as directed by the ERA.</p> <p>It was noted under the Electricity Industry Act 2004, the ERA must not approve a standard form contract if it considered that the contract does not meet the requirements of the Electricity Industry (Customer Contracts) Regulations 2005 or will be inconsistent with the Act or any other written law, or any term, condition or provision of the licence. The ERA was satisfied that Amanda Energy’s amended standard form contract meets these requirements.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The amendments align the contract with the new Code of Conduct for the Supply of Electricity to Small Use Customers 2022, which took effect on 20 February 2023. • Amanda Energy also redrafted its standard form contract in a plain language format to improve customer readability and understanding.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 109			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
111 Type [2]	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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy was member of an approved scheme and there were no decisions or directions by the electricity ombudsman issued.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Energy and Water Ombudsman - Account Activity <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Amanda Energy listed as Service Provider on The Energy and Water Ombudsman website. • Invoice payments to approved scheme provided. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
2023 - NIL 111				
14. CODE OF CONDUCT – LICENCE CONDITIONS AND OBLIGATIONS				
MARKETING				

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
114 Type [2]	Retail 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.	<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy reviewed its induction manual for BDMs to ensure compliance with the Code.</p> <p>The Senior Analyst confirmed Amanda Energy’s customers were primarily contracted by BDMs. An induction process and control procedure have been established to ensure BDMs were familiar with the requirements of the Code of Conduct.</p> <p>The Licensee confirm the occasional use of tendering companies during the audit period. It is understood that tendering companies represent the customer and as tender companies are engaged directly by customers, they would be considered a customer representative and not an electricity marketing agent. Therefore, it was not Amanda Energy’s obligation to ensure that tender companies comply with the Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the interpretation of a marketing agent with regards to the obligations of 2022 was not clear. The 2022 Code of Conduct considers employees of the retailer should be adhering to the requirements of the marketing agent. Refer definition: electricity marketing agent — (a) means a person who acts on behalf of a retailer — (i) for the purpose of obtaining new customers for the retailer; or (ii) in dealings with existing customers in relation to contracts for the supply of electricity by the retailer. <p>and</p> (b) includes a representative, agent or employee of a person referred to in paragraph (a); but (c) does not include a customer representative or the Housing Authority.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 114		
116 Type [NR]	Retail 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.		<p>FINDING: Refer to finding for obligation 109.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ERA website Amanda Energy website

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Refer to observations for obligation 109.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 116		
117 Type [NR]	Retail 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.		FINDING: Refer to finding for obligation 109. DOCUMENTS/SYSTEMS: • ERA website • Amanda Energy website PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Refer to observations for obligation 109.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 117		
118	Retail Licence, condition 6.5.1 - A licensee can only amend the standard form contract with the ERA's approval.		FINDING: Refer to finding for obligation 109.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer to observations for obligation 109.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 118		
119 Type [2]	Retail Licence, condition 4.3.1 - A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy maintained its financial records in compliance with Public Practice Standards as it is a non-reporting entity. It is a trading entity reporting to and on behalf of its directors and shareholders. Australian Accounting Standards Board Standards (AASBs) is required for reporting entities. As such, the Public Practice Standards is equivalent to the AASB's in that Amanda Energy is complying with the applicable standard.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Letter of Authority <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that communication provide to ERA to verify Amanda Energy's accounting records has been referenced in previous performance audits.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 119			
121 Type [2]	Retail 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.			<p>FINDING: The Licensee confirmed that during the audit period, the 2021 Performance Audit was conducted in accordance with the ERA's standard Audit Guidelines. The Licensee engaged GES for the audit period 1 September 2021 to 31 August 2023 and the engagement process adhered to the requirements of the Audit Guidelines.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 121			
123	Retail 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.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy was not under external administration and there were not significant changes affecting the Licensee's ability to meet its obligations.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 123			
124	Retail Licence, condition 4.4.1 - 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy complied with the dates for the submission of reporting and licence payment requirements, with the exception of one minor non-compliance for the late payment of prescribed fees (payment was one day past the due date - refer obligation 105).</p> <p>The Licensee had the following provision of information requirements during the audit period.</p> <ul style="list-style-type: none"> • Annual Compliance Report - Compliance Reports due for submission by the 31 August annually were submitted on time, (Reporting years 2022-2023 within audit scope) • Standing Charges Data – Standing data due for submission by the 30 September annually were submitted on time, (Reporting years 2021-2022 within audit scope) • Electricity Retail Licence Performance Reporting Datasheets – All Electricity Retail Performance Reporting datasheets due for submission by the 30 September annually were submitted on time (Reporting years 2021-2022 within audit scope)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]		<p>• Post Audit Action Plan – The PAIP was provided to the ERA following the 2021 Audit Report and was evident on the ERA website. Compliance with this requirement was noted.</p> <p>Whilst the issues in regard to the timeliness appeared to be well controlled, the accuracy of reporting continued to create some issues for the Licensee compliance with some licence obligations (for example, omission of reporting breaches in the annual compliance report for obligation 105 and 98C). It was the auditor’s opinion that this was primarily due to resourcing issues and workload limiting the ability for updates to the control procedures established. It was noted that in addition to their current workload, the Senior Analyst maintained a significant responsibility for compliance with the Licensee’s electricity retail licence. Risks relating to the tacit knowledge of the management team observed during the previous audit were addressed with the documentation of key process controls.</p> <p>The Licensee has made notable improvements to its control environment supported by a corporate culture of compliance which included the assignment of authority and responsibility, documentation of policies and procedures and the engagement of external legal services.</p> <p>However, Amanda Energy’s information systems and monitoring of controls could be further improved. For example, ensuring controls created, such as the Internal Compliance Manual were updated in response to changes in legislative requirements and ensuring that subsequent updates to internal audit compliance frameworks were effective in achieving compliance.</p> <p>• Post Audit Action Plan – The PAIP was provided to the ERA following the 2021 Audit Report and was evident on the ERA website. Compliance with this requirement was noted.</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Corporate Outlook Calendar • Compliance Breaches Register v1.1 • WIP - Internal Compliance Manual - MASTER (EM) • 2022.09.21 Internal - Performance Datasheet Questionnaire - MASTER (EM) • AE003 - Paying ERA Invoices • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The use of a corporate outlook calendar for the scheduling of compliance related reporting was confirmed. • The accuracy of reporting non-compliances in the annual compliance report was not achieved in some licence obligations, for example obligation 105. • During the audit period there were significant changes to the Customer Contracts regulations and the 2022 Code of Conduct legislative requirements. The Licensee was noted to incorrectly report a breach and to omit the breach in annual reporting requirements. It was noted a legal advisor has been engaged during the audit period to ensure compliance with non-standard contracts. • The administrative tasks associated with compliance were noted to be taxing on the current resources available. • It was noted that the Licensee also held a gas trading licence, GTL15, which subsequent to the recent changes to legislation, now has a close alignment of compliance requirements.
	PRIORITY - 2	CONTROLS RATING - B	COMPLIANCE RATING - 2

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No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	<p>08/2023 RECOMMENDATION: Whilst it was noted that the Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved. The requirement to ensure the accuracy of non-compliance reporting to the ERA still required some improvements to the control environment and the monitoring of the controls. As such, to ensure ongoing compliance, the Licensee should further improve:</p> <ul style="list-style-type: none"> • the updates to controls established required from changes in legislative requirements, such as the Internal Compliance Manual, Life Support Register, etc • the formalisation of the internal audit compliance frameworks as related to legislative updates and with consideration of the future reporting requirements. • the capacity of the internal resources responsible to ensure compliance with the requirements of the electricity retail licence. 		
125 Type [2]	Retail 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy complied with the requirements o to publish the Electricity Retail Licence Performance Reporting Datasheets for the reporting years 2021-2022</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The 2021-2022datasheets were published within 7 days. • Amanda Energy's Website published the datasheets as required.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 125			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
126 Type [2]	Retail Licence, condition 3.7.1 - All notices must be in writing, unless otherwise specified.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy demonstrated evidence of notices and correspondence with ERA in regard to Amanda Energy's Retail Licence obligations.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The use of Hubspot to record outgoing communications with the ERA was being reviewed by the Licensee.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 176		
129A Type [2]	2022 Code of Conduct, CI 8 - A retailer must ensure that its electricity marketing agents comply with Part 2		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Amanda Energy has developed control procedures in relation to this obligation.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 • ESA SUC NSFC Agreement applicable to audit period.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the interpretation of a marketing agent with regards to the obligations of 2022 was not clear (refer observations 114).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 129A		
130 Type [2]	<p>2022 Code of Conduct, CI 9(1)</p> <p>- 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).</p>		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Amanda Energy did not use SFC during the audit period. The Licensee has developed control procedures in relation to this obligation. Evidence of compliance with the requirements of 2.2(1) including the 5 business day timeframes was evidenced.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> AE011 -Marketing Agent Obligations (ERL) Induction Manual (Compliance) (EM) v1.2 ESA SUC NSFC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 130		
131 Type [2]	2022 Code of Conduct, CI 9(2) - Subject to subclause 9(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 9(2) no later than on, or with, the customer's first bill.		FINDING: The Licensee confirmed that for the duration of the audit period applicable, Amanda Energy included a reference to general information on the safe use of electricity in the SFC new contract process. The Senior Analyst confirmed that during the period Amanda Energy did not use the SFC. Notably the Welcome Pack was updated to include a link to information on the safe use of electricity on the Western Power website. It was noted there were no SFCs which required the Welcome Pack during the audit period. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • Welcome Pack - v1.3 • 163.5 Re-sign ESA (New Tenant) • NEW TENANT - FORMAL - Standard Form Contract (SFC) • Email template for new tenants established

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted control Procedure 26.2 Re-sign ESA (New Tenant) was updated to reference sending the SFC via the template provided and the need to attach the Welcome Pack for compliance. It was noted the Welcome Pack V1.1 was compliant with the requirement. The obligation was noted as non-compliant in the 2022 Annual Compliance Report.
	PRIORITY - 3	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 131		
132 Type [2]	2022 Code of Conduct, CI 10(1) - 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>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Amanda Energy's non-standard contracts, were entered into according to the manner set out in clause 10(1). The Licensee has developed control procedures in relation to this obligation. Evidence of compliance with the requirements of 10(1)(b), including the 5 business day timeframes was evidenced.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> AE011 -Marketing Agent Obligations (ERL) ESA SUC NSFC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Sample ESAs provided for review.
	PRIORITY - 3	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 132		
133 Type [2]	2022 Code of Conduct, CI 10(2) - 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable (i.e., 1/9/2021 to 20/2/2023), Amanda Energy included a reference to general information on the safe use of electricity in the NSFC new contract process.</p> <p>The Licensee used the Welcome Pack to convey the requirements and confirmation of inclusion of all information as specified in subclause 2.3(2) was noted.</p> <p>For the audit period 1/9/2021 - 20/2/2023, subsequent to the effect of the 2022 Code of Conduct, the Licensee did not include the requirement of clause 10(2)(a)(ii) of the Code of Conduct, which came into effect 20/02/2023.</p> <p>Specifically requiring Amanda Energy prior to entering into a non-standard contract with a customer, to details of the difference between the non-standard contract and the standard form contract. The Licensee engaged a legal expert to ensure the requirements were met moving forward.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA NSFC Notification - Differences between AE's NSFC and SFC • Welcome Pack - v1.3 • ESA SUC NSFC Agreement applicable to audit period.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> For the period 20/2/2023 to 31/8/2023 16 x customers were contracted without Amanda Energy having provided the summary difference between Standard Form and non-Standard Form contracts. It was determined if all the customers were SUC. It was noted the Welcome Pack was updated to incorporate the requirement to provide general information on the safe use of electricity, however, no document control on the Welcome Pack to indicate date or version.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 2
<p>09/2023RECOMMENDATION: The Licensee has engaged legal services to ensure the compliance requirements in relation its non-standard contracts were achieved. Compliance was confirmed during the site audit (i.e., the ESA NSFC Notification detailing the differences between AE's NSFC and SFC). There are no further recommendations made.</p>			
133A Type [2]	2022 Code of Conduct, CI 10(3) - 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)		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy entered into a non- standard contract with a retailer, the retailer or an electricity marketing agent must give the information specified in clause 10(3)</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Welcome Pack - v1.3 • ESA SUC NSFC Agreement applicable to audit period. • AE011 -Marketing Agent Obligations (ERL) • Amanda Energy Compliance Web • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's non-standard contracts include: <ul style="list-style-type: none"> (a) how the customer may obtain — <ul style="list-style-type: none"> (i) a copy of this code; and (ii) details of all relevant tariffs, fees, charges, alternative tariffs and service levels that may apply to the customer; (b) the scope of this code; (c) that Amanda Energy's BDMs must comply with this code; (d) how the Amanda Energy may assist if the customer is experiencing problems paying a bill; (e) Western Powers 24-hour telephone number for faults and emergencies; (f) Not applicable as no residential customers; (g) how to make an enquiry of, or complaint to, the Amanda Energy; (h) general information on the safe use of electricity (refer Welcome Pack).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 133A		
135 Type [2]	2022 Code of Conduct, CI 10(5) - 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>FINDING: The Licensee confirmed that during the audit period, Amanda Energy used a NSFC which included obtaining verifiable consent. Specific, confirmation of compliance with subclause 2 was confirmed in relation to cooling off periods.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 81.2 Processing of VCF_s • ESA SUC NSFC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted signed ESAs were considered verifiable consent in relations to NSFCs.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 135		
137	2022 Code of Conduct, CI 11(2) - 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		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy complied with the standards of conduct as applicable to marketing agents as defined in clause 11(2).</p> <p>There were no further non compliances identified during the audit period.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [2]	electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints.		<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted this requirement is contained within the BDM Induction Manual • The licensee has since initiated the generation of quarterly memos to remind BDMs of their marketing obligations under the Code of Conduct and revised the induction manual and control procedure. 	
	PRIORITY - 3	CONTROLS RATING - A		COMPLIANCE RATING - 1
	2023 - NIL 137			
138 Type [2]	2022 Code of Conduct, CI 12(1) - A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 12(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, no requests were made by customers for information specified in subclause 2.5(1) (a) and (b). It was noted that this information was provided within the Welcome Pack, and subclause 2.5(1) (c) is referenced on the BDMs/Marketing Agents Business Cards.</p> <p>DOCUMENTS/SYSTEMS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted this requirement was contained within the Induction Manual and the control procedure.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 138			
139 Type [2]	2022 Code of Conduct, CI 12(2) - A retailer or electricity 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. 		<p>FINDING: The Licensee confirmed that for the duration of the audit period, control procedures and training ensured all BDMs had compliant identity cards, a sample was provided. Further, no requests were made for information specified in subclause 2.5(2)(b), however all of this information (subclause 2.5(b)(i) – (vi) was also made available on their business cards which were routinely left with any customers with whom they meet face to face.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 139		
140 Type [2]	2022 Code of Conduct, CI 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 at the premises.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that all BDMS/Marketing Agents were made aware of their obligations and were compliant with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left at the premises.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted this requirement was contained within the Induction Manual and the control procedure.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 140		
141	2018 Code of Conduct, CI 2.9 - 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		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that all BDMS/Marketing Agents were made aware of their obligations and were compliant.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [2]	relating to a complaint, within 28 days of receiving a request for that information.		<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted this requirement is contained within the BDM Induction Manual and the control procedure. • No complaints and no request for information from the Ombudsman were made in regard to this marketing agents during the audit period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 141			
142 Type [2]	2018 Code of Conduct, CI 2.10 - 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, all BDMs/Marketing Agents were made aware of their obligations and were compliant.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE011 -Marketing Agent Obligations (ERL) • Induction Manual (Compliance) (EM) v1.2 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • It was noted this requirement is contained within the BDM Induction Manual and the control procedure.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 142		
CONNECTION			
143 Type [2]	2022 Code of Conduct, CI 18(1) - If a retailer agrees to sell electricity to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the distributor.		FINDING: The Licensee confirmed that for the duration of the audit period, the obligation to forward a connection request to Western Power was undertaken. Compliance with this requirement was evident on the Web Portal. DOCUMENTS/SYSTEMS: • 81.2 Processing of VCF_s • ESA SUC NSFC Agreement applicable to audit period. • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Signed NSFCs were confirmation of agreement to sell electricity to a customer or arrange for the connection of the customer's supply address.

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No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 143			
144 Type [2]	2022 Code of Conduct, CI 18(2) - A retailer must forward the customer's request for connection to the distributor that same day, if the request is received before 3pm on a business day; or the next business day if the request is received after 3pm or on a weekend or public holiday.			<p>FINDING: The Licensee confirmed that for the duration of the audit period, the obligation to forward timely connection requests to Western Power was undertaken. Compliance with this requirement was evident on the Web Portal.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • 81.2 Processing of VCF_s • ESA SUC NSFC Agreement applicable to audit period. • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 144			
BILLING				
145	2022 Code of Conduct, CI 19(1) - A retailer must issue a bill at least once every 100 days, except for the circumstances specified in subclause 19(2).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's billing procedures ensured, bills were issued at least once every 100 days, except for the circumstances specified in subclause 19(2).</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Sample SUC bills provided for review.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 145		
146 Type [2]	2018 Code of Conduct, Cl 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).		<p>FINDING: The Licensee confirmed that during the audit period, there were no SUC customers on a shortened billing cycle. There were no residential customers.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Billing checklist 1 - Placing a customer on a shortened billing cycle – procedure developed but not required to be implemented by the Licensee during the audit period (i.e., no SUC customers on a shortened billing cycle).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 146		
146A Type [2]	2022 Code of Conduct, CI 20(1) - A retailer must not place a customer on a shortened billing cycle unless subclause 20(2) applies.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Amanda Energy SUC Bill sample 172.0 - Billing Checklists - ERL T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The billing checklist was not yet reviewed for alignment with the 2022 Code of Conduct.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 146A		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
148 Type [2]	2022 Code of Conduct, CI 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).		FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. As such, the requirement for the customer to be provided 10 days notice in relation to the shortened billing cycle could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 148			
149 Type [2]	2022 Code of Conduct, CI 20(4) - A retailer must ensure that a shortened billing cycle under subclause 20(2) must be at least 10 business days.		FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. As such, the requirement for the shortened billing cycle to be at least 10 business days could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 149		
150 Type [2]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. The billing checklist incorporated the requirement for on request the return to their previous billing cycle after payment of 3 consecutive bills by the due date. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 150		
151 Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. The billing checklist incorporated the requirement to inform a customer, who was subject to a shortened billing cycle, at least every 3 months about the conditions upon which the customer can be returned to the previous billing cycle.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 151		
152 Type [2]	2018 Code of Conduct, CI 4.3(1) - Notwithstanding clause 4.1, on receipt of a request by a customer, a retailer may provide the customer with a bill that reflects a bill-smoothing arrangement with respect to any 12-month period.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers on a bill smoothing arrangement.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 152		
153 Type [2]	2018 Code of Conduct, CI 4.3(2) - If a retailer provides a customer with a bill under a bill-smoothing arrangement, the retailer must ensure that the conditions specified in subclause 4.3(2) are met.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers on a bill smoothing arrangement. As such compliance with the requirements of clause 4.3(2) were not required.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 153			
154 Type [2]	2018 Code of Conduct, CI 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.			<p>FINDING: The Licensee confirmed that during the audit period, bills were sent to the nominated electronic address, or other nominated address if required.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Billing details were specified in the ESA SUC and NSFC T&Cs.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 154			
155	2018 Code of Conduct, CI 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.			<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy included the applicable minimum prescribed information in subclause 4.5(1) on a customer's bill. Sample bills were reviewed during the audit period, compliance with the relevant minimum prescribed information was evident. It was noted that subclauses 4.5(1)(b), (c), (j),(k) and</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			(bb) were not applicable to the licensee as they did not have any customers with the meter type specified and they did not have any residential customers. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • The NSFC detailed billing requirements.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 155			
155A Type [2]	2022 Code of Conduct, CI 21(1) - 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).		FINDING: The Licensee confirmed that for the duration of the audit period, that in addition to the required contents on a customer’s bill under another provision of this code, Amanda Energy included the information set out in subclauses 21(2), (3), (4), (5) and (6). DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 155A		
156 Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no historical debts identified or billed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 156			
157 Type [2]	2018 Code of Conduct, CI 4.6 - Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following: <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. 			<p>FINDING: The Licensee confirmed that for the duration of the audit period, the bills were based on the Western Power's reading and there were no customers reading meters or Type 7 connection points.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 157		
157A Type [2]	2022 Code of Conduct, CI 22(1) - A retailer must base a customer's bill on the criteria specified in 22(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that Amanda Energy based a customer's bill on the criteria specified in 22(1).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 157A		
157B Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no customers whose bills were subject to smoothing arrangements.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 157B		
158 Type [NR]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, Western Power was responsible for issuing Amanda Energy with daily “Meter Data Notifications” via the Web Portal. There were no instances of failure to provide meter data (estimated or actual) for invoicing purposes. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 158		
158A Type [2]	2022 Code of Conduct, CI 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)		FINDING: The Licensee confirmed that for the duration of the audit period, a written record of any method agreed for the basis of a bill was defined in the non-standard form contract. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • ESA SUC NSFC Agreement applicable to audit period. PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	
	2023 - NIL 158A		
159 Type [2]	2018 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy issued estimated bills where actual meter data were not available. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 159		
160 Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy clearly specified all of the requirements of 4.8(2) on the customer's bill. It was noted that where the bill was based on estimation, the customer could request the basis/reason for the estimation, verification of energy data and a meter reading.</p> <p>Sample bills confirmed compliance with the requirements.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted the Licensee rectified the non-compliance within the previous audit period and sample bills sighted were compliant with the obligation. • The Licensee has established two processes for the identification of bills with estimated data; 1) the data was identified in T4B as such because Western Power labels each interval by read type; and 2) Licensee has implemented a secondary external invoicing check (Community Electricity) which indicated where data has been estimated (based on Web Portal data)
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 1
2023 - NIL 160			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
161 Type [2]	2022 Code of Conduct, CI 23(2) - On request, a retailer must provide to a customer of the basis and the reason for the estimation. ⁹ 9 Refer to clause 23(3) of the code for a definition of an estimated bill in situations where the meter reading is partly based on estimated data (including interval meters).		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy if requested provided customers for information regarding the basis and reason for an estimation DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL 161			
162 Type [2]	2018 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, adjustments were made as the actual meter data becomes available, this occurred during the next billing cycle where the actual meter data was received, and the adjustment can be made. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Examples of bill adjustments were provided for review.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 162		
163 Type [NR]	2022 Code of Conduct, CI 24(2) - If a customer satisfies 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>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy used their best endeavours to ensure replacement of estimated data with actual value.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> There were no instances where a bill was estimated due to a customer failing to provide access to the meter.
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - 1	
	2023 - NIL 163		
164 Type [2]	2018 Code of Conduct, Cl 4.11(1) - If a customer requests the meter to be tested and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, any customer requests for meter investigations (i.e. meter tests) were communicated to Western Power.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Amanda Energy SUC Bill sample 172.0 - Billing Checklists - ERL T4B - Invoicing System PAYMENT CONFIRMATION WP WESTERN POWER COSTS - NON-ENERGY INVOICE - June 23 MONTHLY SUMMARY WESTERN POWER COSTS - AMANDA ENERGY June 23 WESTERN POWER COSTS - NON-ENERGY INVOICE - EXTENDED METERING SERVICES -June 23 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Samples of non-energy invoices and monitoring of WP costs were provided for review.
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 164		
165 Type [2]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, the meter tests undertaken were not found to be defective.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Samples of non-energy invoices and monitoring of WP costs were provided for review.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 165		
166 Type [2]	2022 Code of Conduct, CI 25(2) - If a retailer offers alternative tariffs and a customer meets the 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>FINDING: The Licensee does not offer alternative tariffs. Compliance with this obligation could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 166		
166A Type [2]	2022 Code of Conduct, CI 25(3) - If a customer transfers from one tariff to another under clause 25, the effective date is as subscribed under subclause 25(3).		<p>FINDING: The Licensee does not offer alternative tariffs. Compliance with this obligation could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 166A			
167 Type [2]	2022 Code of Conduct, CI 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.		FINDING: Refer to finding for Obligation 166. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 167			
168	2018 Code of Conduct, CI 4.14(1) - If a customer requests a retailer to issue a final bill at the customer’s supply address, a retailer must use		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy used reasonable endeavours to arrange for final bills in accordance with customer’s requests.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [NR]	reasonable endeavours to arrange for that final bill in accordance with the customer's request.		<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6). 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL 168			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
169 Type [2]	2018 Code of Conduct, CI 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.	<p>FINDING: The Licensee confirmed that for the duration of the audit period, all final bills were handled in accordance with the billing checklist. The billing checklist referred to this obligation i.e. the 12 business days for refund. The Senior Analyst also confirmed during the audit period there were no customers who had an account in credit at the time of closure.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • Sample final bills reviewed. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6).

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 169			
170 Type [2]	2018 Code of Conduct, CI 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 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).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, all final bills were handled in accordance with the billing checklist. The billing checklist referred to this obligation. Specific application of the process was not evidenced. The Senior Analyst also confirmed during the audit period there were no customers who had an account in credit and who owed a debt at the time of closure.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • Sample final bills reviewed.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 171		
172 Type [2]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's billing process referenced the availability of meter testing following bill review. All other compliance requirements were met for the duration of the audit period. It was confirmed that during the audit period, bill reviews were handled in accordance with the billing checklist. It was noted that reference to Amanda Energy's complaint handling process was noted on customer bills sampled. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • Billing Checklist was compliant, updated induction manual included reference to this requirement.
	PRIORITY - 3	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 172		
173 Type [2]	2022 Code of Conduct, Cl 27(2)(b) - 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 requires and may require the customer to pay the amount (if any) of the bill that is outstanding.		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. The billing checklist contained procedures or overcharging and undercharging of customers. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 173		
174 Type [2]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • The were no complaints in regards to bill review by customers..
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 174		
175 Type [2]	2022 Code of Conduct, CI 27(4) - 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>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. As such no customers were informed of a bill review result in excess of the 20 business days from date of receipt of the request for the review.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 175		
175A	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's billing process referenced the availability of meter testing following bill review. All other compliance requirements were met for the duration of the audit period.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>It was confirmed that during the audit period, bill reviews were handled in accordance with the billing checklist. It was noted that reference to Amanda Energy’s complaint handling process was noted on customer bills sampled.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Billing Checklist was compliant, updated induction manual included reference to this requirement.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 175A		
175B Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, the meter tests undertaken were not found to be defective.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Samples of non-energy invoices and monitoring of WP costs were provided for review.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 175B		
176 Type [2]	2022 Code of Conduct, CI 29(1) - If a retailer proposes to recover an amount undercharged a retailer must do so in the manner specified in subclause 29(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. There were no instances noted where the Licensee was required to recover an amount undercharged.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: <ul style="list-style-type: none"> • Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 176		
177 Type [NR]	2022 Code of Conduct, CI 30(1) - If a customer (including a customer who has vacated the supply address) has been overcharged the retailer must: <ul style="list-style-type: none"> <input type="checkbox"/> use its best endeavours to inform the customer of the amount overcharged within 10 business days after the retailer becomes aware of the overcharging; and <input type="checkbox"/> subject to this clause ask the customer for instructions for the credit or repayment of the amount. 		FINDING: The Licensee confirmed that for the duration of the audit period, there were no instances where a customer who has vacated the supply address was overcharged as a result of an error, defect, or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: <ul style="list-style-type: none"> The customers who vacated the supply address were billed in accordance with the requirements. There were no complaints in relation to billing and vacating supply address.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 177		
178 Type [2]	2022 Code of Conduct, CI 30(2) - 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.		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. As no payments required, there was no requirement for compliance with 12 business days. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> 172.0 - Billing Checklists - ERL T4B - Invoicing System Amanda Energy SUC Bill sample Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 178		
179 Type [NR]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. Instructions were received within 5 business days as such compliance with this requirement cannot be assessed DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • Nil
	PRIORITY - 5	CONTROLS RATING - NP	
	2023 - NIL 179		
180 Type [NR]	2018 Code of Conduct, CI 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).		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. DOCUMENTS/SYSTEMS:

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 180		
181 Type [NR]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. No examples of overcharge used to set off debt were identified</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> A review of sample bills within the audit period confirmed no SUC overcharge used to offset debt
	PRIORITY - 2	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 181 (Note 181 was incorrectly assigned audit priority 2 in the audit plan)		
181A Type [NR]	2022 Code of Conduct, CI 30(7) - Subclause 30(6) does not apply if the customer is a customer experiencing financial hardship.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. No examples of overcharge used to set off debt were identified, and no hardship customers were overcharged.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 172.0 - Billing Checklists - ERL T4B - Invoicing System Amanda Energy SUC Bill sample Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Nil
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2023 - NIL 181A			
181B Type [NR]	2022 Code of Conduct, CI 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).		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. No examples of credit used to set off debt were identified DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • Nil 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 181B			
182	2018 Code of Conduct, CI 4.19(1) - If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of a customer, the retailer must comply with the requirements specified in subclause 4.19(1).		FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. All requirements of subclause were noted to be compliant.	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 182			
183 Type [NR]	2018 Code of Conduct, CI 4.19(2) - 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: <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), ask the customer for instructions about the repayment of the amount. 		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS			
		<ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil 			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">PRIORITY - 5</td> <td style="width: 25%;">CONTROLS RATING - NP</td> <td style="width: 50%;">COMPLIANCE RATING - NR</td> </tr> </table>	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR			
	2023 - NIL 183				
183A Type [2]	2022 Code of Conduct, CI 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.	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy used reasonable endeavours to arrange for final bills in accordance with customer's requests.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) 			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6) and versions as amended February and August 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 183A		
183B Type [2]	2022 Code of Conduct, CI 31(2) - 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 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>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did arrange for final bills where a customer's account was in credit.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6) and versions as amended February and August 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 183B		
183C Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, all final bills were handled in accordance with the billing checklist. The billing checklist referred to this obligation i.e. the 12 business days for refund. The Senior Analyst also confirmed during the audit period there were no customers who had an account in credit at the time of closure.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6) and versions as amended February and August 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 183C		
183D Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, all final bills were handled in accordance with the billing checklist. The billing checklist referred to this obligation. Specific application of the process was not evidenced. The Senior Analyst also confirmed during the audit period there were no customers who had an account in credit and who owed a debt at the time of closure.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6) and versions as amended February and August 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 183D		
183E Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, all final bills were handled in accordance with the billing checklist. The billing checklist referred to this obligation. Specific application of the process was not evidenced. The Senior Analyst also confirmed during the audit period there were no customers who had an account in credit and who owed a debt at the time of closure and required an offset clause as detailed in the NSFCs.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Sample Final Bills • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Compliance with this requirement is detailed in the billing checklist. • There were no customer complaints raised during the audit period. • The SUC NSFC referenced the requirements (refer V1.5 and 1.6) and versions as amended February and August 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 183E		
184 Type [2]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. As no payments required, there was no requirement for compliance with 12 business days.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations for Obligation refer 182
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 184			
184A Type [2]	2022 Code of Conduct, CI 32(1) - Despite any other arrangement or agreement that may be in place between the retailer and the customer in relation to 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.			<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no customers supplied under a standard form contract and as such compliance with this requirement could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 • ERA website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> The SFC was approved by the ERA during the audit period and was published on the ERA website.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 184A		
185 Type [NR]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist. Instructions were received within 5 business days as such compliance with this requirement cannot be assessed</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 172.0 - Billing Checklists - ERL T4B - Invoicing System Amanda Energy SUC Bill sample Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer observations for Obligation refer 182
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 185		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
186 Type [NR]	2018 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, bill reviews were handled in accordance with the billing checklist and that there were no adjustments owing to the customer, or where the customer owed a debt to the retailer. As such requirements relating to offset of debt or credits were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • T4B - Invoicing System • Amanda Energy SUC Bill sample • Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted the Licensee does not have any residential customers. As such the assessment for experiencing payment difficulties or financial hardship was not applicable. • As no payments required, there was no requirement for compliance.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 186		
PAYMENT			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
187 Type [2]	2022 Code of Conduct, CI 93 - The date by which a bill must be paid must not be earlier than 12 business days from the bill issue date.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that the ESA-SUC and NSFCs and billing software specified bills for small use customers had at least 16 Day Payment Terms, which allow for 12 Business Days. Samples were provided for review.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Samples of estimated bills were provided for review. • The Licensee ensured the invoicing software billed for SUCs (16 or 21 day Payment Terms, or accounts with longer payment terms).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 187		
188	2022 Code of Conduct, CI34(1) - A retailer must accept payment for a bill prescribed in subclause 34(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that the 2018 and 2022 Code of Conduct provided for the option for Amanda Energy to contractually agree to payment methods. The Licensee's NSFCs required that "the bill will specify a</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			range of payment options, including payment in person and by mail”. A review of the bills confirmed the requirement. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • ESA SUC NSFC Agreement (Versions February & August 2023) • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • A review of the NSFCs confirmed compliance with the requirement.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 188		
189	2018 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, with respect to the instances where Amanda Energy had established a direct debit facility with the customer it was noted that: a) the customer’s verifiable consent was obtained;

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			b) agreements with the customer for the date of commencement of the facility were made; and c) the frequency of the direct debits was determined. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Sample Direct Debit Customers Audit Period • XERO • T4B - Invoicing System PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • Sample selection and email communications were reviewed. • It was noted the completed direct debit form satisfied (a); the agreements with the customer for the date of commencement were evidenced through email communication and met requirement of (b); and the frequency of the direct debits was as per the terms of the NSFC as per (c)
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 189			
190	2022 Code of Conduct, CI 95(1) to (3) - A retailer must accept payment in advance from a customer. This will not require a retailer to credit any interest to the amounts paid in advance. The amount of \$20 is the minimum		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy accepted requests for payments in advance per the Billing Checklist.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [2]	amount a retailer is required to accept from a customer (although a retailer may accept lower amount if it thinks fit).		DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL 190			
190A Type [2]	2022 Code of Conduct, CI 95(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.		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not determine a maximum credit amount and as such compliance with the requirements in relation to publishing on their website were not required. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 190A			
191A Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, if requested, Amanda Energy redirected a customer's bill to a different address (including to an email address or a different email address) on the customer's request and at no charge.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • Sample Customer Folders <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the ESA agreement contained the contact details and the billing systems were updated if required.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 191A		
197 Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, in the instances where a customer vacated the supply address the billing checklist specified the requirements to ensure the customer did not pay for supply after the provision of notice.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> T4B - Invoicing System XERO Amanda Energy SUC Bill sample 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The customers who vacated the supply address were billed in accordance with the requirements.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				• There were no complaints in relation to billing and vacating supply address.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2023 - NIL 197			
198 Type [2]	2022 Code of Conduct, CI 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 customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.			<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no customers who vacated a supply address to eviction or were otherwise required to vacate during the audit period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 198			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
199 Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no instances where previous new customers were required to pay for electricity consumed at the supply address in the circumstances specified.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The customers who vacated the supply address were billed in accordance with the requirements. • There were no complaints in relation to billing and vacating supply address.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 199		
201	2022 Code of Conduct, CI 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, entered into a contract for the supply of electricity to that supply address.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no occurrences where anyone, but the customer as the contract holder of the supply address, has paid for debts.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • T4B - Invoicing System • XERO • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 201			
201A. Type [NR]	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, there were no requests to transfer debt to another customer. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 172.0 - Billing Checklists - ERL • WIP - Internal Compliance Manual - MASTER (EM) PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • NIL

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 247		
PAYMENT ASSISTANCE			
228	2022 Code of Conduct, CI 47 - A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy considered all reasonable requests for alternative payment arrangements, including extended payment terms, direct debit arrangements, and in some cases, offsetting a debt owed with a credit to Amanda Energy for a service or goods that the customer can provide.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • AE001 - Amanda Energy Financial Hardship Policy • FW_ Delay in invoice payment for Parmelia Hilton • FW_ Overdue Account \$1_026_23 • FW_ Amanda Energy Solutions invoice VEN202109 - Perth North Balcatta • FW_ Payment extension to 20th May <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Evidence was noted in respect to a customer encountering difficulty with the payment of bills during COVID, the Licensee and customer agreed to offset the debt to the same value for exchange of the commodity the customer produced.
Type [2]			
	PRIORITY - 2	CONTROLS RATING - A	
	2023 - NIL 228		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
DISCONNECTION		
229 Type [2]	2022 Code of Conduct, CI 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 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).	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy complied with all limitations when arranging for disconnection due to failure to pay a bill as specified in clause 48.</p> <p>The control procedures established were noted to be effective in ensuring compliance with the requirements related to disconnection for failure to pay bill.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec) • Disconnection Service Order - Export - 2023-09-03T143818.052 • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 229 - Disconnection Warning Text 1 XERO • 229 - Disconnection Warning Text 2 XERO • 229 - Reminder Notice Text XERO <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The control procedures established were noted to include: <ul style="list-style-type: none"> - Reminder Notice not sooner than 15 business days from dispatch of bill. - Reminder Notice included a Telephone Number and how Amanda Energy can assist if SUC experiencing payment difficulties. - Automatic Xero Reminders. - Best endeavours to contact customer to advise of proposed disconnection. - Disconnection Warning not sooner than 20 business days from dispatch of bill. Included advice that retailer may disconnect with 5 business days notice, the existence of complaints process, existence of ombudsman, and contact details of ombudsman. - Automatic Xero Disconnection Warning. .
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 229		
230 Type [2]	2022 Code of Conduct, Cl 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>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy complied with all limitations when arranging for disconnection due to failure to pay a bill. The Licensee has revised the control procedure to reflect the requirement not to arrange disconnection within 1 business day of the period referred to in Disconnection Warning.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Disconnection Service Order - Export - 2023-09-03T143818.052 • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 229 - Disconnection Warning Text 1 XERO • 229 - Disconnection Warning Text 2 XERO • 229 - Reminder Notice Text XERO <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Control processes to highlight legislative requirements within procedures was noted i.e. use of red text.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 230		
232 Type [2]	2022 Code of Conduct, Cl 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not arrange disconnection a customer's supply address for denying access to the meter.</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec) • Disconnection Service Order - Export - 2023-09-03T143818.052 • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 229 - Disconnection Warning Text 1 XERO • 229 - Disconnection Warning Text 2 XERO • 229 - Reminder Notice Text XERO <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The licensee has established control procedures in relation to disconnection for denying access to meter. There was no requirement to reference the procedures.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 232		
232A Type [2]	2022 Code of Conduct, CI 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 replacing a meter, or checking the accuracy of the customer's consumption at the supply address.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not arrange disconnection a customer's supply address for denying access to the meter.</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec) • Disconnection Service Order - Export - 2023-09-03T143818.052 • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 229 - Disconnection Warning Text 1 XERO • 229 - Disconnection Warning Text 2 XERO • 229 - Reminder Notice Text XERO <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The licensee has not yet updated control procedures in relation to disconnection for denying access to meter for obligation 232A. • It was noted there was no requirement to reference the procedures during the audit period.
	PRIORITY - 2	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 232A		
234	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, that subject to subclause 52(3) Amanda Energy complied with the general limitations on disconnections specified in subclauses 52(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.</p> <p>It was noted requirements relating to not proceeding with disconnection if a complaint was unresolved, or customer was on life support were addressed by the control procedures.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [1]		<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 2023.09.21 Lead Allocation and Phone Script V3 • 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec) • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 152.1 Complaints Handling Procedure • 2022.04.04 Complaints Handling Training_Summary • Notification of De-Registration of Life Support Equipment at SUPPLY ADDRESS • T4B - Invoicing System <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's Complaints Handling Procedure was updated to include reference to the “Customer Complaint Guideline – October 2016” and if a complaint is unresolved, or customer is on life support. • It was noted it provided examples of the differences between a complaint and a query. • All staff were made aware through a monthly office meeting about the updated complaints handling procedure to further expand on our understanding of what may constitute a customer complaint. • Training was scheduled for late March with all team members. • The updated disconnection control procedure (refer 12/2021) stated that a disconnection may not occur with a complaint in process, and now further stated that the complaint was to be identified per Amanda Energy's complaints handling procedure.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • The actions taken in relation to the Complaints Handling process were effective • Note there were no small use customers registered for life support during the audit period.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 234		
235 Type [1]	2018 Code of Conduct, Cl 7.7(1) - 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not have any small use customers registered for life support equipment.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Life Support Register V1 • Induction Manual (Compliance) (EM) v1.2 • Quiz Answer - Induction Manual (Compliance) (EM) V1.2) • 166.1 - LSE - Registering a Life Support Equipment Customer • 167.0 - LSE - Making Changes to the Life Support Equipment Register <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Details were maintained in a life support register which was cross checked with contract details, email communication with Western Power. They were noted to be LUCs. The control procedures were well established in relation to training, documentation and verified communication with Western Power in relation to the large use life support customer.
	PRIORITY - 2	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 235		
236 Type [1/2]	2018 Code of Conduct, Cl 7.7(2) - 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: <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 that the address no longer requires registration as life support equipment address. 		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not have any small use customers registered for life support equipment.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Life Support Register V1 Induction Manual (Compliance) (EM) v1.2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Quiz Answer - Induction Manual (Compliance) (EM) V1.2 • 166.1 - LSE - Registering a Life Support Equipment Customer • 167.0 - LSE - Making Changes to the Life Support Equipment Register • Annual Confirmation of Life Support Equipment Registration at SUPPLY ADDRESS • Re-Certification required for Life Support Equipment at SUPPLY ADDRESS <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Details were maintained in a life support register which was cross checked with contract details, email communication with Western Power. They were noted to be LUCs. • The control procedures were well established in relation to training, documentation and verified communication with Western Power in relation to the large use life support customer.
	PRIORITY - 2	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 236		
240 Type [2]	2018 Code of Conduct, Cl 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not have any small use customers registered for life support equipment. It was noted there was one customer requiring registration as life support equipment at the supply address and they were large use customers and not small use customers.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Life Support Register V1 • Induction Manual (Compliance) (EM) v1.2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Quiz Answer - Induction Manual (Compliance) (EM) V1.2 • 166.1 - LSE - Registering a Life Support Equipment Customer • 167.0 - LSE - Making Changes to the Life Support Equipment Register • Annual Confirmation of Life Support Equipment Registration at SUPPLY ADDRESS • Re-Certification required for Life Support Equipment at SUPPLY ADDRESS <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Details were maintained in a life support register which was cross checked with contract details, email communication with Western Power. They were noted to be LUCs. • The control procedures were well established in relation to training, documentation and verified communication with Western Power in relation to the large use life support customer.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 240		
241 Type [2]	2018 Code of Conduct, Cl 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's customers requiring registration as life support equipment at the supply address were large use customers and not small use customers.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Life Support Register V1 • Notification of De-Registration of Life Support Equipment at SUPPLY ADDRESS • 168.1 - LSE - When Life Support Equipment is no longer required

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Details were maintained in a life support register which was cross checked with contract details, email communication with Western Power. They were noted to be LUCs. The control procedures were well established in relation to training, documentation and verified communication with Western Power in relation to the large use life support customer.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 241		
RECONNECTION			
242 Type [2]	2022 Code of Conduct, CI 53(2) - A retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection or made arrangements 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>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's re-connections related to the supply addresses being disconnected for the specified reasons and all reconnections were all move-ins.</p> <p>A retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection, requested the reconnection and made arrangements as required (i.e., entered into a payment plan for the charges).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 155.0 - Re-Connection Guide SUC WP Web Portal Complaints Register v2 <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted that the Licensee developed a control procedure for SUC Reconnection.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 242		
243 Type [2]	2022 Code of Conduct, CI 53(3) - A retailer must forward the request for reconnection to the distributor within the timeframes specified in subclause 53(3).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy's re-energisation requests confirmed all requests were submitted the same day.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 155.0 - Re-Connection Guide SUC WP Web Portal Complaints Register v2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS		
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 243	
INFORMATION & COMMUNICATION		
271D. Type [2]	2022 Code of Conduct, Cl 68(1) - The retailer must publish on its website the information detailed in subclause 68(1).	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy published the following information as required on its website —</p> <ul style="list-style-type: none"> • cost-effective and efficient ways to utilise electricity; • the typical running costs of major domestic electrical appliances; and • a summary of a customer’s rights, entitlements and obligations under the retailer’s standard complaints and dispute resolution procedures; and • the contact details for the electricity industry ombudsman; and • a copy of this code. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • ERA website • Ombudsman website • Welcome Pack • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> It was noted that the Licensee did not supply electricity to residential customers and as such was not required to publish; information about concessions; a hardship policy; or a family violence policy.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 271D.			
271E Type [2]	2022 Code of Conduct, CI 68(3) - If a customer requests 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy provided the applicable information referred to in subclause (1) free of charge to the customer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Sample Customer Folders <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 271E			
271F Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not requested to provide a copy of the applicable information referred to in subclause (1) to the customer.</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Sample Customer Folders <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 271F		
272 Type [2]	2018 Code of Conduct, CI 10.1(1) - A retailer must give notice of any variations in its tariffs, fees and charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy that customers were advised of any tariff variations no later than the next bill per procedure and samples provided.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Sample Customer Folders • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Third party services were sought to assist with verifying tariff increases were calculated as required.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 272		
273 Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy received requests to provide information on its tariffs, fees and charges. It was confirmed by Amanda Energy that they did not charge for the requests, and they did not offer alternative tariffs. This was noted to be consistent with the NSFC.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Sample Customer Folders • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Third party services were sought to assist with verifying tariff increases were calculated as required.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL		
274 Type [2]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy provided information in writing upon request. Compliance with the 8 business was noted.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Sample Customer Folders • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee’s general policy was to communicate this information via email. • It was noted customer queries were responded to as requested within 2 business days.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		
274A Type [2]	2022 Code of Conduct, CI 71(2) - 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy gave notice to customers of any variation to its tariffs, fees or charges, that affected the customer in the manner specified in subclauses 71(3) and (4).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Sample Customer Folders

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Amanda Energy SUC Bill sample • 172.0 - Billing Checklists - ERL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's customers tariffs, fees or charges were not regulated or set by the State Government.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		
280 Type [2]	2022 Code of Conduct, CI 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 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>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy provided customers at least once a year written details of their obligations to make payments to the customer under Part 14 of Code of Conduct nor did they include the amount of the payment and the eligibility criteria for the payment</p> <p>The control procedures established were effective in ensuring compliance and sample bills reviewed confirmed the implementation of the requirements. Relating to service standard payments.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Service Standard Fee Statement • Service Standard Payment Notice (P4) - Updates - SERVICE STANDARD PAYMENT • RE_ T4B - Compliance Annual Email <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • This requirement has now been scheduled to be added to customers' bills annually. • Sample bills sighted confirmed implementation • The Licensee sent the notice to all applicable customers invoiced during the audit period. • The Licensee coordinated with invoicing software team – T4B – to establish the wording and for it to be released annually with August billing (released in September) for SUCs (16 or 21 day Payment Terms, or accounts with longer payment terms). • It was noted that T4B requirements were updated to issue the statement on all invoices to ensure they captured any SUCs who have been placed on other payment terms. E.g. DER – 14 Days, Capricorn accounts 30 Days EOM.
	PRIORITY - 1	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		
281 Type [2]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not receive any requests from customers related to general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • ERA website • Ombudsman website • Welcome Pack • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6)

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • ESA SUC NSFC Agreement (Versions February & August 2023) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The required information was included on the Licensee's website, control procedures and contract documentation.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 281		
282 Type [2]	2022 Code of Conduct, CI 74 - If asked by a customer for information relating to the distribution of electricity, a retailer must give the information to the customer or refer the customer to the distributor for a response.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not receive any requests from customers related to the distribution of electricity. As such, the Licensee did not refer the customer to the relevant distributor for a response.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 2023.09.21 Lead Allocation and Phone Script V3 • Induction Manual (Compliance)(EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee has developed procedures to record occurrences. • It was noted the CRM which had capability to record outgoing emails against client and log call information was no longer being utilised by the Licensee.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 282		
290 Type [NR]	2022 Code of Conduct, CI 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.		<p>FINDING: A sampled review of the documentation provided by the Licensee during the audit period confirmed, Amanda Energy's processes provided for written information to be expressed in clear, simple, concise language and in a format that was easy to understand.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Energy website • ERA website • Ombudsman website • Welcome Pack • ESA SUC NSFC Agreement (Versions - 1.5 and 1.6) • ESA SUC NSFC Agreement (Versions February & August 2023) • Amanda Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Examples of documentation reviewed included ESAs, NSFCs, bills, notices, emails, responses to queries, communication of tariff increases, website information etc. Specific document references are detailed for each obligation and referenced in Appendix 2
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
291 Type [2]	2018 Code of Conduct, CI 10.10(1) - On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.		<p>FINDING: During the audit period the Analyst confirmed, Amanda Energy did not receive any requests on how to obtain a copy of the Code of Conduct.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 2023.09.21 Lead Allocation and Phone Script V3 • ESA SUC NSFC Agreement applicable to audit period. • Amanda Energy website • Privacy Policy • [REDACTED] • 173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that reference to this obligation is contain in the ESAs and NFSCs. Welcome Packs and is linked via Amanda Energy website. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL			
292	2018 Code of Conduct, CI 10.10(2) - A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no		<p>FINDING: The Licensee confirmed that for the duration of the audit period, and a review of Amanda Energy's website verified the Code of Conduct was available on their websites, at no charge.</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [2]	charge.		DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Amanda Energy website • ERA website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • https://amandaenergy.com.au/code-of-conduct/ • The Code of Conduct linked toward the bottom of website. • The link connects to the ERA website as a source for the Code of Conduct. 	
	PRIORITY - 3	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2023 - NIL			
297 Type [2]	2022 Code of Conduct, Cl 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.		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy did not receive any requests from customers related to the availability of different types of meters or refer the customer to the relevant distributor for a response. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 2023.09.21 Lead Allocation and Phone Script V3 • Induction Manual (Compliance) (EM) v1.2 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS			
		OBSERVATIONS: • NIL			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">PRIORITY - 4</td> <td style="width: 25%;">CONTROLS RATING - NP</td> <td style="width: 50%;">COMPLIANCE RATING - NR</td> </tr> </table>	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR			
	2023 - NIL 297				

LIFE SUPPORT SCHEME

297B Type [1]	2022 Code of Conduct, CI 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.	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to undertake the registration of life support equipment address for a small use customer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Amanda Life support Equipment Registration Form • Life Support Register V1 • 166.1 - LSE - Registering a Life Support Equipment Customer <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Life Support registration processes were established, and control procedures developed as evidenced by the LUC requiring life support.
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ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 2	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 297B			
297C Type [2]	2022 Code of Conduct, CI 82(3) - A retailer must provide 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.			<p>FINDING: Refer obligation 297B.</p> <p>DOCUMENTS/SYSTEMS:</p> <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer to obligation 297B
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 297C			
297D	2022 Code of Conduct, CI 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 retailer must, in accordance with the relevant standard, a. register the change and			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to register a change in relation to a SUC for life support equipment address.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
Type [1/210]	b. provide a notification to the distributor of the change.		<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • RE_ Life Support Reconciliation June 2023 • Annual Confirmation of Life Support Equipment Registration at SUPPLY ADDRESS • Amanda Life support Equipment Registration Form • 167.1 - LSE - Making Changes to the Life Support Equipment Register • 169.1 - LSE - Re-Certifying a Life Support Equipment Address • Life Support Register V1 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Life Support registration processes were established, and control procedures developed as evidenced by the LUC requiring life support. 	
	PRIORITY - 2	CONTROLS RATING - A		COMPLIANCE RATING - NR
	2023 - NIL 297D			
297H Type [2]	2022 Code of Conduct, CI 85(1) - 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to undertake a periodic review, as prescribed under subclause 85(1), in relation to a SUC for life support equipment address.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • RE_ Life Support Reconciliation June 2023 • Annual Confirmation of Life Support Equipment Registration at SUPPLY ADDRESS 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Amanda Life support Equipment Registration Form • 167.1 - LSE - Making Changes to the Life Support Equipment Register • 169.1 - LSE - Re-Certifying a Life Support Equipment Address • Life Support Register V1 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Life Support periodic review processes were established, and control procedures developed as evidenced by the LUC requiring life support.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 297H		
2971 Type [2]	2022 Code of Conduct, Cl 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to undertake a periodic review, as prescribed under subclause 85(2), in relation to a SUC for life support equipment address.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 167.1 - LSE - Making Changes to the Life Support Equipment Register • 169.1 - LSE - Re-Certifying a Life Support Equipment Address • Life Support Register V1 • Induction Manual (Compliance) (EM) v1.2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Life Support periodic review and de-registration processes were established, and control procedures developed as evidenced by the LUC requiring life support.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 2971		
297(J) Type [2]	2022 Code of Conduct, Cl 86(2) - If a retailer is notified that a customer's supply address no longer requires registration as a life support equipment address, the retailer must de-register the address as prescribed in subclause 86(2).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to de-register a SUC for life support equipment address. As such, compliance with the requirements as prescribed under subclause 86(2) could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 167.1 - LSE - Making Changes to the Life Support Equipment Register 169.1 - LSE - Re-Certifying a Life Support Equipment Address Life Support Register V1 Induction Manual (Compliance) (EM) v1.2 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Life Support de-registration processes were established, and control procedures developed as evidenced by the LUC requiring life support.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 297(J)			
297(K) Type [2]	2022 Code of Conduct, CI 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).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to de-register a SUC for life support equipment address. As such, compliance with the requirements as prescribed under subclause 86(3) and 86(4) could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Life Support Register V1 • 167.1 - LSE - Making Changes to the Life Support Equipment Register • 168.1 - LSE - When Life Support Equipment is no longer required <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer obligation observations 297(J).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 297(K)			
297(L) Type [2]	2022 Code of Conduct, CI 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)			<p>FINDING: Refer to finding obligation 297(K).</p> <p>DOCUMENTS/SYSTEMS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Refer to documents and systems obligation 297(K). <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer obligation observations 297(J).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 297(L)		
297(N) Type [2]	2022 Code of Conduct, CI 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.		<p>FINDING: Refer to finding obligation 297(K).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Refer to documents and systems obligation 297(K). <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer obligation observations 297(J).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 297(N)		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
298 Type [2]	2022 Code of Conduct, Cl 87(1) - Each retailer and distributor must develop, maintain and implement a standard complaint and dispute resolution procedure.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy developed, maintained and implemented their Complaints Handling procedure.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 152.1 Complaints Handling Procedure • 152.1 Complaints Handling Procedure_Form • 2022.03.04 Compliance_Minutes • 2022.04.04 Complaints Handling Training_Summary • Agenda_Complaints Handling Training • Complaints Register v2 • 2023.09.21 Lead Allocation and Phone Script V3 • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted the Licensee's complaints handling processes were reviewed during the current audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 298			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's complaints handling procedure under subclause 87(1) complied with the requirements specified in subclauses 87(2)(a), (b), (c) and (d). • The Licensee updated their Complaints Handling procedure and updated the revised procedure to their website. • Additionally internal training was undertaken to ensure the required personnel were aware of the revised complaints handling procedure.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 2
<p>10/2023 RECOMMENDATION: The Licensee addressed the non-compliance in relation to Amanda Energy's obligations to establish complaints handling procedures in the 2021 PAIP and in the 2022 Annual Compliance Report. Corrective actions were verified and there are no further recommendations to be made.</p>			
299A Type []	2022 Code of Conduct, Cl 87(3) - The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014.		<p>FINDING: Refer finding obligation 299.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 152.1 Complaints Handling Procedure • 152.1 Complaints Handling Procedure_Form • 2022.03.04 Compliance_Minutes • 2022.04.04 Complaints Handling Training_Summary • Agenda_Complaints Handling Training • Complaints Register v2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Note the requirement for clause 87(3) commenced after the Licensee had updated their complaints handling procedures. As such compliance was note for the period 20/2/2023-31/8/2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 299A		
300 Type [2]	2018 Code of Conduct, CI 12.1(3) - A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy' complaint processes and procedures confirmed the customer's right to escalate the complaint to a senior officer for review or to the Energy and Water Ombudsman in accordance with complaints procedure was specified. The Licensee's bills referenced the Energy and Water Ombudsman contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> 152.1 Complaints Handling Procedure Complaints Register v2_Audit 01.09.21 - 31.08.23 Amanda Energy website Amanda Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: <ul style="list-style-type: none"> Sample bills reviewed confirmed free call number of Energy and Water Ombudsman.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 300		
301	2022 Code of Conduct, CI 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.		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy complied with the requirements in relation to acknowledgement and response time for customer complaints. It was noted the Complaints Handling procedure dispute resolution criteria aligned with the requirements i.e. 10 days to acknowledge complaint and 20 days to respond, DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> 152.1 Complaints Handling Procedure Complaints Register v2_Audit 01.09.21 - 31.08.23 Amanda Energy website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst Alex Bell - Office & Finance Manager OBSERVATIONS: <ul style="list-style-type: none"> The complaints register was reviewed and sample email communication to verify compliance.
Type [2]			
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 301		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
301A Type [2]	2022 Code of Conduct, CI 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).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy complied with the requirements relating to advice about the outcome of complaint. It was noted the complaints handling process ensured the Licensee:</p> <ul style="list-style-type: none"> (a) informed the customer of the outcome of a complaints process; and (b) unless the customer advised that the complaint had been resolved in a manner acceptable to the customer, informed the customer — <ul style="list-style-type: none"> (i) of the reasons regarding the outcome; and (ii) that if the customer was not satisfied with the outcome, the customer may make a complaint or take a dispute to the electricity industry ombudsman; and (iii) provided the contact details for the electricity industry ombudsman. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 152.1 Complaints Handling Procedure • Complaints Register v2_Audit 01.09.21 - 31.08.23 • Amanda Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The complaints register was reviewed and sample email communication to verify compliance.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Amanda Energy undertook training with all relevant personnel (sales/ admin / accounts - i.e., anyone likely to interact with customers) to specifically address the updates to the complaints handling process. • The Licensee updated their Complaints Handling procedure and updated the revised procedure to their website. • Additionally, training was undertaken to ensure the difference between a complaint and query was understood by the required personnel.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 2
11/2023 RECOMMENDATION: Refer to recommendation 10/2023 in relation to obligation 299. No further recommendations are made.			
303 Type [2]	2018 Code of Conduct, CI 12.3 - On request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer to utilise the respective complaints handling processes.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy provided customers information that would assist the customer to utilise the respective complaints handling processes.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 152.1 Complaints Handling Procedure • Complaints Register v2_Audit 01.09.21 - 31.08.23 • Amanda Energy website • Amanda Energy SUC Bill sample

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS			
		<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There was no charge for information that assisted the customer in utilising the respective complaints handling processes. • Information was accessible on the customer invoices and the website. 			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">PRIORITY - 4</td> <td style="width: 25%;">CONTROLS RATING - NP</td> <td style="width: 50%;">COMPLIANCE RATING - 1</td> </tr> </table>	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1			
	2023 - NIL 303				
304 Type [2]	2022 Code of Conduct, CI 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).	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy referred any complaints from customers that did not relate to its functions.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • 152.1 Complaints Handling Procedure • Complaints Register v2_Audit 01.09.21 - 31.08.23 • Amanda Energy website • Amanda Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager 			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • Complaints were routinely referred to Western Power as appropriate, for example outages, etc.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 304		
REPORTING			
305 Type [2]	2018 Code of Conduct, CI 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.		FINDING: Refer finding obligation 124. DOCUMENTS/SYSTEMS: • Corporate Outlook Calendar • Compliance Breaches Register v1.1 • WIP - Internal Compliance Manual - MASTER (EM) • 2022.09.21 Internal - Performance Datasheet Questionnaire - MASTER (EM) • AE003 - Paying ERA Invoices • 175.1 - Min Lead Timeframe Calculator (2022 - 2024) PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Refer observations obligation 124.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 305		
306 Type [2]	2018 Code of Conduct, CI 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.		FINDING: Refer finding obligation 124. DOCUMENTS/SYSTEMS: • Refer documents and systems obligation 124. PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Refer observations obligation 124.
	PRIORITY - 2	CONTROLS RATING - A	
	COMPLIANCE RATING - 1		
	2023 - NIL 306		
307 Type [3]	2018 Code of Conduct, CI 13.3 - The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: <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. 		FINDING: Refer finding obligation 125. DOCUMENTS/SYSTEMS: • Refer documents and systems obligation 125.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations obligation 125.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 1
	2023 - NIL 307		
SERVICE STANDARD PAYMENTS			
308 Type [2]	2018 Code of Conduct, CI 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.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to make service standard payments. As such compliance with the requirements relating to facilitating customer reconnections were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Service Standard Fee Statement • WIP - Internal Compliance Manual - MASTER (EM) • RE_ T4B - Compliance Annual Email <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Control procedures have been established for the requirements associated with service standard payments.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 308			
308A. Type [2]	2022 Code of Conduct, CI 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).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to make service standard payments. As such compliance with the requirements relating to facilitating customer reconnections were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Service Standard Fee Statement • WIP - Internal Compliance Manual - MASTER (EM) • RE_ T4B - Compliance Annual Email <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Control procedures have been established for the requirements associated with service standard payments.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2023 - NIL 308A.			
308B.	2022 Code of Conduct, CI 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.			FINDING: Refer to the finding for obligation 308A

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]			DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • T4B - Service Standard Fee Statement • WIP - Internal Compliance Manual - MASTER (EM) • RE_ T4B - Compliance Annual Email PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> • Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 308B.			
310 Type [2]	2022 Code of Conduct, CI 95(1) - Unless clause 99 applies, a retailer must make the payment specified under subclause 95(2) if the retailer: <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 to pay a bill in contravention of clause 49, 50 or 52 for failure to pay a bill. 		FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to make a service standard payment as a result of a wrongful disconnection. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • 106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec) • Disconnection Service Order - Export - 2023-09-03T143818.052 • 170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec) • 229 - Disconnection Warning Text 1 XERO • 229 - Disconnection Warning Text 2 XERO • 229 - Reminder Notice Text XERO • Life Support Register V1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 310		
312 Type [2]	2022 Code of Conduct, CI 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.		FINDING: The Licensee responded to all complaints (refer obligation 302) in accordance with the prescribed timeframes. As such payments were not required. DOCUMENTS/SYSTEMS: • T4B - Service Standard Fee Statement • WIP - Internal Compliance Manual - MASTER (EM) • 152.1 Complaints Handling Procedure PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst • Alex Bell - Office & Finance Manager OBSERVATIONS: • Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 312		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS			
315 Type [2]	2022 Code of Conduct, CI 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). <table border="1" data-bbox="280 861 1093 909"> <tr> <td data-bbox="280 861 510 909">PRIORITY - 4</td> <td data-bbox="510 861 779 909">CONTROLS RATING - NP</td> <td data-bbox="779 861 1093 909">COMPLIANCE RATING - 1</td> </tr> </table>	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	<p>FINDING: The Licensee confirmed that for the duration of the audit period, Amanda Energy was not required to make service standard payment to a customer under clause 94, 95 or 96. As such assessment of compliance with the requirements of subclause 100(1) could be undertaken.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • T4B - Service Standard Fee Statement • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations 308A.
PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1			
2023 - NIL 315					
15 ELECTRICITY INDUSTRY METERING CODE 2012 – LICENCE CONDITIONS AND OBLIGATIONS					
324 Type [2]	Electricity Industry Metering Code, CI 3.3B - If a user is 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 flows, the user must notify the network operator within 2 business days.	<p>FINDING: The Licensee confirmed that during the audit period, there were no occasions where Amanda Energy became aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flow and as such resulted in changes in a customer's circumstances in a metering point that resulted in bi-directional flows.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Meter Reconfiguration 			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Customer attribute update • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was understood internal control processes would identify sites where bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flow.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 324			
339 Type [2]	Electricity Industry Metering Code, CI 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.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy was not aware of any outages or malfunction of a metering installation in relation to customer accounts.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 339			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
371 Type [NR]	Electricity Industry Metering Code, CI 4.4(1) - If there is a discrepancy 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.		FINDING: The Licensee confirmed that during the audit period, if Amanda Energy became aware of a discrepancy between energy data held in a metering installation and in the metering database. Communication with Western Power to resolve the discrepancy was undertaken. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 371			
372 Type [NR]	Electricity Industry Metering Code, CI 4.5(1) - A Code participant must not knowingly permit the registry to be materially inaccurate.		FINDING: Refer to finding for obligation 371. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 372		
373 Type [2]	Electricity Industry Metering Code, Cl 4.5(2) - Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.		FINDING: Refer to finding for obligation 371. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	
	2023 - NIL 373		
388 Type [2]	Electricity Industry Metering Code, Cl 5.4(2) - A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator’s obligation under subclause 5.4(1).		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy provided Western Power when requested, information to assist them to validate energy data contained in the metering database as required by their obligations, refer Appendix 2 of the Metering Code. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 388			
402 Type [2]	Electricity Industry Metering Code, CI 5.17(1) - 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 agreement to do so for billing purposes or for the purpose of providing metering services to the customer.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy was obligated to supply meter data to the customer on request and at no charge and did so on request as described by the control procedure. DOCUMENTS/SYSTEMS: • WP Web Portal • 147.2 - Ordering Historical Meter Data in ██████ PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2023 - NIL 402			
406	Electricity Industry Metering Code, CI 5.19(1) - A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in		FINDING: The Licensee confirmed that during the audit period, Amanda Energy complied with any requests by the network operator to collect information from customers.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [2]	meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.		DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - 1	
2023 - NIL 406			
407 Type [NR]	Electricity Industry Metering Code, Cl 5.19(2) - A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated. Note: The prescribed information listed in clause 5.19(2) was changed by the Electricity Industry (Metering) Amendment Code 2018.		FINDING: The Licensee confirmed that during the audit period, Amanda Energy complied with any request to collect and maintain a record of the address, site and customer attributes other than that provided at transfer DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS:

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • It was noted one LUC transferred to the Licensee during the audit period who was an existing Life Support Customer. • It was noted in general this information was collected by Western Power.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 407		
408 Type [2]	Electricity Industry Metering Code, CI 5.19(3) - Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.		<p>FINDING: The Licensee confirmed that during the audit period, Amanda Energy established procedures with respect to new tenants to ensure that when a new customer took over the supply address, a site details notification update is completed. However, it was noted, during the period May to December 2022, on 3 occasions the Licensee did not update Customer Details Notification (CCDN) within 1 business day as required.</p> <p>The Licensee has reviewed control processes and no further non-compliance have been noted.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ESA SUC NSFC Agreement applicable to audit period. • Welcome Pack - v1.3 • 163.5 Re-sign ESA (New Tenant) • NEW TENANT - FORMAL - Standard Form Contract (SFC) • Email template for new tenants established • Compliance Breaches Register v1.1 • WP Web Portal

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • The Licensee identified the non-compliance as part of its internal review processes.
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2
12/2023 RECOMMENDATION: It was noted, during the period May to December 2022, on 3 occasions the Licensee did not update Customer Details Notification (CDN) within 1 business day as required. The Licensee has reviewed control processes and not further non-compliance have been noted. There are no further recommendations made.			
410 Type [NR]	Electricity Industry Metering Code, CI 5.19(6) - The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.		FINDING: The Licensee confirmed that during the audit period, confirmed that Western Power generates notice of changed Standing Data attributes, which the licensee acknowledged without further correspondence to Western Power DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2023 - NIL 410		
416 Type [2]	Electricity Industry Metering Code, CI 5.21(5) - A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.		FINDING: The Licensee confirmed that during the audit period, when meter tests were requested Amanda Energy was a user under the code at the time of the request. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • Evidence of meter data test requests were provided.
	PRIORITY - 4	CONTROLS RATING - NP	
	COMPLIANCE RATING - 1		
	2023 - NIL 416		
417 Type [2]	Electricity Industry Metering Code, CI 5.21(6) - A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy could only request a test only if at the time of the request it is the incumbent retailer. Amanda Energy made no requests that were inconsistent with any access arrangement or agreement. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - 1	
	2023 - NIL 417		
435 Type [2]	Electricity Industry Metering Code, CI 5.27 - Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy did not receive a request from the network operator in relation to customer attribute information that it reasonably believes are missing or incorrect DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2023 - NIL 435		
448 Type [2]	Electricity Industry Metering Code, CI 6.1(2) - A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy has and ETAC and has complied with rules, procedures, agreements and criteria prescribed. The Licensee uses the Western Power portal to make all metering transactions and thus meet compliance with Western Power’s rules, procedures, agreements and criteria. DOCUMENTS/SYSTEMS:

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • WP Web Portal • 2023.08.14 ETAC Amanda Energy [Signed] • 2018.09.26 ETAC Second Deed of Amendment Signed • WIP - Internal Compliance Manual - MASTER (EM) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Relevant documentation included Metering Code Communication Rules (refer Build Pack SWIS Communication Rules), Model Service Level Agreement, Metrology Procedure.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 448		
451 Type [NR]	Electricity Industry Metering Code, CI 7.2(1) - Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.		<p>FINDING: The Licensee confirmed that during the audit period, that Amanda Energy and Western Power did not encounter difficulties. Evidence of communication with network operator reviewed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Eva Mitchell – Senior Analyst

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Evidence of communication with the network operator was sighted. It was noted that Amanda Energy removed the facsimile (as generally an obsolete means of communication) contact details from its website and NSFCs. It is understood the facsimile can still be received but is converted to email. Notification to Western Power of the change was outside the scope of the audit.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 451		
453 Type [2]	Electricity Industry Metering Code, Cl 7.2(4) - If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.		<p>FINDING: The Licensee confirmed that during the audit period, that Amanda Energy was not requested by the network operator to notify its contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> NIL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 453		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
454 Type [2]	Electricity Industry Metering Code, CI 7.2(5) - A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy has not had any requirements to notify the network operator of any change to its contact details. DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 454			
455 Type [2]	Electricity Industry Metering Code, CI 7.5 - A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.		FINDING: The Licensee confirmed that during the audit period, that Amanda Energy has established internal policies and codes of conduct in relation to privacy, confidentiality and the handling of sensitive information. In respect to the Metering Code “confidential information” refers to standing data and energy data; and any other information which is confidential information of, or commercially sensitive to, a customer or code participant. DOCUMENTS/SYSTEMS: • Privacy Policy • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: <ul style="list-style-type: none"> The Licensee has developed a Privacy Policy and Code of Conduct.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 455		
456 Type [2]	Electricity Industry Metering Code, CI 7.6(1) - A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.		FINDING: Refer finding for obligation 455. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Eva Mitchell – Senior Analyst OBSERVATIONS: <ul style="list-style-type: none"> Refer observations for obligation 455.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2023 - NIL 456		
457	Electricity Industry Metering Code, CI 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.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
Type [NR]			DOCUMENTS/SYSTEMS: • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 457			
458	Electricity Industry Metering Code, CI 8.1(2) - 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 officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
Type [NR]			
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2023 - NIL 458			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
459 Type [NR]	Electricity Industry Metering Code, CI 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.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2023 - NIL 459			
460 Type [2]	Electricity Industry Metering Code, CI 8.1(4) - If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 460		
461 Type [NR]	Electricity Industry Metering Code, CI 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).		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • 2023.08.14 ETAC Amanda Energy [Signed] PERSONNEL INTERVIEWED: • Eva Mitchell – Senior Analyst OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2023 - NIL 461		

Note:

- * indicates obligation was reclassified during the audit period from NR to Type 2 (Refer Amendment Record - Electricity Compliance Reporting Manual – June 2020). Prior to this period the rating was NR.
 - ** indicates identified as non-compliant in previous audit or an Annual Compliance Report
- NP - not possible to provide a controls rating because no activity has taken place to exercise the obligation during the audit period.

NR - Not applicable to audit period and as such compliance was not assessed.

APPENDIX 2 – AUDIT DOCUMENT LISTING

Documents Reviewed

Table 12 - Documents Reviewed

Note: If blank document assessment, the document was reviewed but not assessed during the audit process.

DOCUMENT REF NUMBER	DOCUMENT NAME	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
	List of all documentation reviewed, and evidence sampled.						
1	BILLING						
2	172.0 - Billing Checklists - ERL					X	
3	Sample Direct Debit Customers Audit Period					X	
4	Sample Final Bills					X	
5	C93736743-invoice-list-Amanda Energy Solutions-20210901-20230831					X	
6	2021.12.10 XXXXXX					X	
7	2022.08.22 - XXXXXXX					X	
8	2022.08.31 - XXXXXXX					X	
9	2022.09.15 - XXXXX XXXXXXX XXXXXXXXXXX					X	
10	2022.10.16 - XX XXXXXXX					X	
11	2023.02.16 - XXXXXXX XXXXXXX					X	
12	2023.02.16 - XXXXX					X	
13	2023.07.31 - XXXXXXX					X	
14	2023.08.22 - XXXXXXX					X	
15	2023.08.22 - XXXXXXX					X	
16	2023.08.23 - XXXXXXX					X	
17	Sample Bills - XXXXXXX					X	
18	Sample Bills - XXXXXXX					X	
19	Sample Bills - XXXXXXX					X	
20	Sample Bills - XXXXXXX					X	
21	Sample Bills - XXXXXXX					X	
22	Sample Bills - XXXXXXX					X	
23	Amanda Energy SUC Bill sample					X	
24	XERO					X	
25	T4B - Invoicing System					X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
	BUSINESS MANAGEMENT						
26	NEW Procedure Template v1.1 (EM)	X	X	X	X	X	X
27	Letter of Authority			X			
28	2023.09.08 Amanda Energy Business Overview & Organisational Chart	X	X	X	X	X	X
29	Amanda Energy Compliance Web	X	X	X	X	X	
30	APPROVAL REQUESTED - INTERNAL POST 2021 PERFORMANCE AUDIT REVIEW			X			
31	2022 02.09 Monthly Meeting Minutes	X	X	X	X	X	X
32	Amanda Energy Risk Management Policy	X	X	X	X	X	X
33	2023.09.11 - 5.11 Prep Procedure _ Business Continuity _ Recovery Plan	X	X	X	X	X	X
34	2023.09.12 Risk Management Summary	X	X	X	X	X	X
35	2023.09.12 Wholesale elect. risk management (MJ)	X	X	X	X	X	
	COMPLAINTS						
36	Complaints Register v2_Audit 01.09.21 - 31.08.23					X	
37	152.1 Complaints Handling Procedure					X	
38	152.1 Complaints Handling Procedure_Form					X	
39	2022.03.04 Compliance_Minutes					X	
40	2022.04.04 Complaints Handling Training_Summary					X	
41	Agenda_Complaints Handling Training					X	
42	COMPLAINTS HANDLING PROCEDURE					X	
43	Customer Complaint Guidelines - December 2016					X	
44	Customer Complaint - Fw Direct debit form for [REDACTED]					X	
45	Customer Complaint - Fw_ Electricity [REDACTED]					X	
46	Customer Complaint - Fw_ Renewal Documents + Price Increase Letter from Delorean					X	
47	Complaints Register v2					X	
48	2023.02.13 ESA SUC - Bundled Terms and Conditions - Non-Fillable					X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
49	ESA SUC Fillable - Amanda Energy - Non Standard Form Contract v1.5					X	
50	ESA SUC Fillable - Bundled Amanda Energy - Non Standard Form Contract v1.6					X	
51	ESA SUC NSFC Agreement (Versions - 1.5 and 1.6)					X	
	COMPLIANCE - CUSTOMER COMMUNICATION					X	
52	Amanda Energy Solutions invoice XXXXXXXX11					X	
53	Amanda Energy Solutions invoice XXXXXXXX 07					X	
54	Amanda Energy Solutions invoice XXXXXXXX 71					X	
55	Amanda Energy Solutions invoice XXXXXXXX 08					X	
56	Amanda Energy Solutions invoice XXXXXXXX 03					X	
57	Amanda Energy Solutions invoice XXXXXXXX 01					X	
58	Amanda Energy Solutions invoice XXXXXXXX 08 - SERVICE STANDARD PAYMENT					X	
59	Sample Listing of Reminders Sent					X	
60	2023.09.21 LEAD ALLOCATION and PHONE SCRIPT V3	X	X	X	X	X	X
	COMPLIANCE - CUSTOMER CONTRACTS						
61	2022.08.24 ESA LUC - Unbundled fillable PDF		X	X	X	X	
62	2022.08.26 ESA LUC - Bundled Fillable PDF		X	X	X	X	
63	2022.09.02 ESA LUC - Discount Fillable PDF		X	X	X	X	
64	2022.10.19 ESA LUC - Bundled Fillable PDF		X	X	X	X	
65	2022.10.19 ESA LUC - Discount Fillable PDF		X	X	X	X	
66	2023.02.09 ESA LUC - Bundled Fillable PDF		X	X	X	X	
67	2023.02.10 ESA LUC - Discount Fillable PDF		X	X	X	X	
68	2023.02.10 ESA LUC - Unbundled fillable PDF		X	X	X	X	
69	ESA LUC - B bundled fillable PDF		X	X	X	X	
70	ESA LUC - D discount fillable PDF		X	X	X	X	
71	ESA LUC - U unbundled fillable PDF		X	X	X	X	
72	ESA NSFC Notification - Differences between AE's NSFC and SFC		X	X	X	X	
73	ESA SFC - NSFC Notification		X	X	X	X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
74	Amanda Energy Standard Form Contract		X	X	X	X	
75	Re: Electricity Supply - XXXXXXXXXXX - Obligation 100		X	X	X	X	
76	Amanda Energy - Standard Form Contract v1.2		X	X	X	X	
77	ESA SUC Fillable - Amanda Energy - Non Standard Form Contract v1.4		X	X	X	X	
78	2017.07.18 SUC Solar Power Purchase Agreement (MJ)		X	X	X	X	
79	2023.08.17 ESA SUC Standard Form Contract Particulars		X	X	X	X	
80	2023.08.17 ESA SUC Standard Form Contract Terms and Conditions		X	X	X	X	
81	Email template for new tenants established		X	X	X	X	
82	NEW TENANT - FORMAL - Standard Form Contract (SFC)		X	X	X	X	
83	173.0 Non-Standard Form Contract (NSFC) - Updating the Terms and Conditions		X	X	X	X	
84	ESA GSA Master Contracts Register v1		X	X	X	X	
85	149.0 New Tenant - Standard Form Contract Information		X	X	X	X	
86	2022.01.14 LUC Solar Power Purchase Agreement TEMPLATE (MJ)		X	X	X	X	
87	Welcome Pack - v1.2		X	X	X	X	
88	Welcome Pack - v1.3		X	X	X	X	
89	Welcome Pack v1.1		X	X	X	X	
90	Welcome Pack		X	X	X	X	
91	RE Churn Update	X					
92	Sample Customer Folders	X					
93	Emails with WP RE Data Request and CTR Request Limit Increase	X					
	COMPLIANCE - ERA COMMUNICATION						
94	RE_ Updated SUC Standard Form Contract for Amanda Energy Pty Ltd			X	X	X	
95	Commencement of 2023 audit - ERL20 - Amanda Energy Pty Ltd			X	X	X	
96	Commencement of 2023 audit - ERL020 - Amanda Energy			X	X	X	
97	Reminder letter - 2021 audit - ERL020 - Amanda Energy			X	X	X	
98	Appointment of Auditor - Commencement of 2023 audit - ERL20 - Amanda Energy Pty Ltd			X	X	X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
99	RE_ Auditor approval - 2021 audit - Amanda Energy			X	X	X	
100	ARTRX_XXXXX84			X	X	X	
101	ARTRX_XXXXX74			X	X	X	
102	Remittance Advice from AMANDA ENERGY SOLUTIONS 31Aug2021			X	X	X	
103	Remittance Advice from AMANDA ENERGY SOLUTIONS 31Aug2022			X	X	X	
	COMPLIANCE - INTERNAL COMMUNICATION						
104	Compliance Statement [Email 29/08/2023] - SERVICE STANDARD PAYMENT					X	
105	RE: T4B - Compliance Annual Email - SERVICE STANDARD PAYMENT					X	
106	APPROVAL REQUESTED			X	X		
107	KPI TEMPLATE	X	X	X	X	X	X
108	RE_ Payment of Economic Regulation Authority Invoices - Internal Memo			X	X		
	COMPLIANCE - INTERNET			X	X	X	
109	Amanda Energy website			X	X	X	
110	ERA website			X	X	X	
111	Ombudsman website			X	X	X	
112	Post-audit-implementation-plan---2021-audit-report---Amanda-Energy---ERL20			X	X	X	
113	Code of Conduct for the Supply of Electricity to Small Use Customers website link			X	X	X	
114	Energy and Water Ombudsman - Account Activity			X	X	X	
115	Service Standard Payment Notice (P4) - Updates			X	X	X	
116	Amanda20210831Page4Compliance			X	X	X	
117	XXXXXXXXX108			X	X	X	
118	XXXXXXXXX08			X	X	X	
119	RE_ T4B - Compliance Annual Email			X	X	X	
120	Privacy Policy			X	X	X	
	LICENCE COMPLIANCE						
121	Corporate Outlook Calendar			X	X		

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
122	155.0 - Re-Connection Guide SUC			X	X		
123	Compliance Breaches Register v1.1			X	X		
124	2021-Electricity-Retail-Licence-Performance-Reporting-Datasheets			X	X		
125	2022-Electricity-Retail-Licence-Performance-Reporting-Datasheets			X	X		
126	2023-Electricity-Retail-Licence-Performance-Reporting-Datasheets			X	X		
127	2021 post-audit implementation plan (PAIP)			X	X		
128	RE_ Amanda Energy Pty Ltd - Electricity Retail Licence Performance Reporting Datasheet			X	X		
129	PAIP REVIEW - APPROVAL REQUEST			X	X		
130	Payment of Economic Regulation Authority Invoices			X	X		
131	2022.09.21 Internal - Performance Datasheet Questionnaire - MASTER (EM)			X	X		
132	AE003 - Paying ERA Invoices			X	X		
133	AMANDA_ENERGY_SOLUTIONS_-_Approved_and_paid			X	X		
134	RE_ Payment of Economic Regulation Authority Invoices			X	X		
135	WIP - Internal Compliance Manual - MASTER (EM)			X	X		
136	2020-Electricity-Retail-Licence-Performance-Reporting-Datasheets-Revised - website link			X	X		
137	2021-Electricity-Retail-Licence-Performance-Reporting-Datasheets - website link			X	X		
138	2022-Electricity-Retail-Licence-Performance-Reporting-Datasheets - website link			X	X		
139	Complaints Handling Procedure website link			X	X		
140	RE: Amanda Energy Pty Ltd - Electricity Retail Licence Performance Reporting Datasheet 2022			X	X		
141	RE: Amanda Energy Pty Ltd - Electricity Retail Licence Performance Reporting Datasheet 2021			X	X		
142	FW_ Reminder - 2021 performance audit - Amanda Energy - ERL20			X	X		
143	Standing Charges Invoices			X	X		
144	2023.09.29 Amanda Energy Electricity Retail Standing Data			X	X		

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
145	Letter to licensee - Approval of auditor - 2023 performance audit- ERL20 - Amanda Energy Pty Ltd			X	X		
146	RE_ HPECM_ Amanda Energy Pty Ltd - 2022 Electricity Retail Licence Standing Charges			X	X		
147	2021.09.30 Amanda Energy Electricity Retail Standing Data			X	X		
148	2022.09.30 Amanda Energy Electricity Retail Standing Data			X	X		
149	RE_ Amanda Energy Pty Ltd - 2023 Electricity Retail Licence Standing Charges			X	X		
150	RE_ Amanda Energy Annual Electricity Licence Compliance Report			X	X		
151	RE_ Amanda Energy Pty Ltd - Gas Trading Licence Performance Reporting Datasheet			X	X		
152	RE_ HPECM_ Amanda Energy Pty Ltd - Electricity Retail Licence Performance Reporting Datasheet			X	X		
153	Relayed_ Amanda Energy Pty Ltd - Electricity Retail Licence Performance Reporting Datasheet			X	X		
154	Acknowledgement - 2021 Licence Standing Charge Data - ERL20 - Amanda Energy Pty Ltd			X	X		
155	2021 post-audit implementation plan - update			X	X		
156	FW_ HPECM_ RE_ Request for update - post-audit implementation plan - 2021 audit - ERL20 - Amanda Energy Pty Ltd			X	X		
	COMPLIANCE - VERIFIABLE CONSENT						
157	81.2 Processing of VCF_s			X	X		
158	VCF Summary Audit Period V 7.0			X	X		
159	VCF Summary from 1 July 2022			X	X		
160	Energy Data Consent Email Template			X	X		
161	Energy Data Consent Forms_BLANK_v4			X	X		
	COMPLIANCE - WP COMMUNICATION						
162	2018.09.26 ETAC Second Deed of Amendment Signed			X	X		
163	2023.08.14 ETAC Amanda Energy [Signed]			X	X		
164	Signed ETAC - Amanda Energy Pty Ltd 31 10 2013			X	X		
165	WP SOC and Remittance					X	X

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
166	Customer attribute update					X	X
167	Meter Reconfiguration					X	X
168	2021.08.31 Amanda Energy Annual Compliance Report (Electricity)					X	X
169	2022.08.31 Amanda Energy Annual Compliance Report (Electricity)					X	X
170	2023.08.31 Amanda Energy Annual Compliance Report (Electricity)					X	X
	CUSTOMER COMMUNICATION						
171	2022.05.06 Roof Lease TEMPLATE					X	
172	2022.07.29 - XXXXXXXXXX - re-energisation sample email					X	
173	2023.09.05 - XXXXXXXXXX - re-energisation sample email					X	
174	2021.04.22 XXXXXXXXXX - Rate query					X	
175	2022.05.16 - XXXXXXXXXX - Rate query					X	
176	2023.03.01 XXXXXXXXXX - Rate query					X	
177	XXXXXXXXXX RCTI 202110					X	
178	XXXXXXXXXX RCTI 202111					X	
179	XXXXXXXXXX RCTI 202206					X	
180	XXXXXXXXXX RCTI 202207					X	
181	RCTI XXXXXXXXXX 09					X	
182	RCTI XXXXXXXXXX					X	
183	RCTI XXXXXXXXXX					X	
184	RCTI XXXXXXXXXX					X	
185	RCTI XXXXXXXXXX					X	
186	RCTI XXXXXXXXXX					X	
187	RCTI XXXXXXXXXX					X	
188	RCTI XXXXXXXXXX					X	
189	Amanda Energy Solutions invoice XXXXXXXXXX 81 - SERVICE STANDARD PAYMENT					X	
190	Amanda Energy Solutions invoice XXXXXXXXXX 08 - SERVICE STANDARD PAYMENT					X	
191	Amanda Energy Solutions invoice XXXXXXXXXX08 - SERVICE STANDARD PAYMENT					X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
192	Amanda Energy Solutions invoice XXXXXXXX81 - SERVICE STANDARD PAYMENT					X	
193	Amanda Energy Solutions invoice XXXXXXXX08 - SERVICE STANDARD PAYMENT					X	
194	Amanda Energy Solutions invoice XXXXXXXX81 - SERVICE STANDARD PAYMENT					X	
195	Amanda Energy Solutions invoice XXXXXXXX08 - SERVICE STANDARD PAYMENT					X	
196	Amanda Energy Solutions invoice XXXXXXXX08 - SERVICE STANDARD PAYMENT					X	
197	T4B - Service Standard Fee Statement					X	
198	Service Standard Payment Notice (P4) - Updates - SERVICE STANDARD PAYMENT					X	
199	██████████ - CMD and NTDL Query					X	
200	XXXXXX XXXXXX - CMD Enquiry					X	
201	Updates to our Terms and Conditions					X	
202	Electricity Supply - _ XXXXXXXX					X	
203	New Ownership ██████████ revised					X	
204	New Tenant Details - XXXXXXXXX					X	
205	RE_ Gas Consent Form - Amanda Energy quote					X	
206	RE_ New Ownership XXXXXXXX					X	
	CUSTOMER TRANSFER					X	
207	27.9 New Client Transfer Amanda Energy (EM)					X	
208	175.1 - Min Led Timeframe Calculator (2022 - 2024)					X	
209	44.1 Transfer Email Templates					X	
210	01.09.21 to 30.06.22 Churn Summary					X	
211	FY-23 Churn Summary					X	
212	126.3 Western Power Customer Transfer Request					X	
213	147.2 - Ordering Historical Meter Data in █████					X	
214	27.9 New Client Transfer Amanda Energy					X	
215	171.0 - Submitting an Erroneous Customer Transfer					X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
216	WP Web Portal Export - All CTRs					X	
217	WP Web Portal Export - All Erroneous CTRs					X	
218	RE NMIXXXXXXXXX43 erroneous transfer					X	
	DISCONNECTION						
219	106.3 - SUC Disconnection Checklist - Failure to Pay a Bill (Elec)					X	
220	Bill XXXXXXXX10 from AMANDA ENERGY SOLUTIONS is 17 days overdue - Disconnection Warning					X	
221	Bill INV-3227 from AMANDA ENERGY SOLUTIONS is 17 days overdue - Disconnection Warning					X	
222	FW_ Bill XXXXXXXX09 from AMANDA ENERGY SOLUTIONS is 18 days overdue - Disconnection Notice					X	
223	RE_ Bill XXXXXXXX8G from AMANDA ENERGY SOLUTIONS is 17 days overdue - Disconnection Warning					X	
224	RE_ Bill XXXXXXXXXXXX61 from AMANDA ENERGY SOLUTIONS is 17 days overdue - Disconnection Warning					X	
225	Export - 2023-09-03T143818.052 - DISCONNECTION SERVICE ORDER					X	
226	229 - Disconnection Warning Text 1 XERO					X	
227	229 - Disconnection Warning Text 2 XERO					X	
228	229 - Reminder Notice Text XERO					X	
229	Export - 2023-09-03T143818.052					X	
230	Disconnection Service Order - Export - 2023-09-03T143818.052					X	
231	170.0 - SUC Disconnection Checklist - Denying Access to Meter (Elec)					X	
232	AE001 - Amanda Energy Financial Hardship Policy					X	
	HARDSHIP						
233	FW_ Amanda Energy Solutions invoice XXXXXXXX09					X	
234	FW_ Delay in invoice payment for [REDACTED]					X	
235	FW_ Overdue Account \$1_026_23					X	
236	FW_ Payment extension to 20th May					X	
	LIFE SUPPORT						

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
237	Amanda Life support Equipment Registration Form					X	
238	Life Support Equipment Registration Form					X	
239	NMI XXXXXXXXX40 - Life Support Requirement					X	
240	RE_ [REDACTED] Life Support Customer					X	
241	RE_ [REDACTED] - Life Support Form					X	
242	166.1 - LSE - Registering a Life Support Equipment Customer					X	
243	167.0 - LSE - Making Changes to the Life Support Equipment Register					X	
244	166.2 - LSE - Registering a Life Support Equipment Customer					X	
245	167.1 - LSE - Making Changes to the Life Support Equipment Register					X	
246	168.1 - LSE - When Life Support Equipment is no longer required					X	
247	169.1 - LSE - Re-Certifying a Life Support Equipment Address					X	
248	Annual Confirmation of Life Support Equipment Registration at SUPPLY ADDRESS					X	
249	Notification of De-Registration of Life Support Equipment at SUPPLY ADDRESS					X	
250	Re-Certification required for Life Support Equipment at SUPPLY ADDRESS					X	
251	Sample Customer Email RE Life Support Equipment and Interruptions					X	
252	Sample Life Support Customer Registration Email to Western Power					X	
253	Life Support Register V1					X	
254	RE_ Life Support Reconciliation June 2023					X	
255	Induction Manual (Compliance) (EM) v1.2					X	
256	Quiz Answer - Induction Manual (Compliance) (EM) V1.2)					X	
257	WIP - Induction Manual (Compliance) (EM)					X	
	MARKETING						
258	2023.08.31 Customer List	X		X		X	
289	AE011 -Marketing Agent Obligations (ERL)	X		X		X	

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
290	128.1 Customer Tariff Variations	X		X		X	
290	163.5 Re-sign ESA (New Tenant)	X		X		X	
292	Pricing Risk Model (██████)	X		X		X	
293	Direct Debit Customers	X		X		X	
294	Payment Confirmation Wp Western Power Costs - Non-Energy Invoice - June 23	X		X		X	
295	Payment Confirmation Wp Western Power Costs - Non-Energy Invoice - Nov 21	X		X		X	
296	Payment Confirmation Wp Western Power Costs - Non-Energy Invoice -Apr 22	X		X		X	
297	155.2 - Re-Connection Guide SUC (Electricity)	X		X		X	
298	Monthly Summary Western Power Costs - Amanda Energy June 23	X		X		X	
299	Monthly Summary Western Power Costs - Amanda Energy March 22	X		X		X	
300	Monthly Summary Western Power Costs - Amanda Energy Nov 21	X		X		X	
301	Western Power Costs - Non-Energy Invoice - Extended Metering Services -June 23	X		X		X	
302	Western Power Costs - Non-Energy Invoice - Extended Metering Services -Nov 21	X		X		X	
303	Western Power Costs - Non-Energy Invoice - Extended Metering Services -Apr 22	X		X		X	
304	WP Build Pack	X		X		X	
305	WP Web Portal	X		X		X	