

Post Audit Implementation Plan

Ref / year – section of act	Non-compliance	Action to be taken	By (name / position)	When
04/2023 90	<p>A2</p> <p><i>Electricity Industry (Customer Contracts) Regulations</i></p> <p>Reg 16(1), 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. 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. 	<p>Amanda notes the non-compliance for not having issued an NSFC T&C update notice earlier in the year - since then all SUCs have been placed on the SFC T&Cs so a notice advising of NSFC T&C update is not required. However, we accept for future reference should a customer be contracted on NSFC T&Cs that an update notice is to be issued and published if the T&Cs are subsequently amended. To ensure this is clearly understood an internal memo will be issued advising of this PAIP item, with a reminder of the obligations under regulation 34. Amanda Energy’s procedures already dictate that NSFC T&Cs updates should be issued to customers and published, so no procedural updates required at this time. The procedure is to be distributed alongside the internal memo.</p> <p>A post-audit (ERL and GTL) internal compliance session</p>	Senior Analyst	<p>Internal memo sent by 21/12/2023</p> <p>Team Meeting by 28/02/2024</p>

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	<ul style="list-style-type: none"> 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>will be held in early 2024 when both audits are complete, to discuss as a team the non-compliances identified to improve organisational awareness.</p> <p>ACTIONS:</p> <ul style="list-style-type: none"> Send an internal memo to team, with NSFC Update procedure attached, reminding team of obligations under Regulation 34. Schedule Post-Audit Compliance Outcome team meeting and training session. 		
08/2023 124	<p>B2 <i>Retail Licence</i> 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 regards to late payment of prescribed fees and the failure to include the non-compliance in the subsequent annual compliance report.</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 were not adequate to ensure accurate and timely reporting of information to the ERA.</p>	<p>An editable excel version of the 2023 Compliance Manual is in development and will become Amanda’s internal and interactive resource for whole-of-team reporting, compliance queries, procedure updates and legislative updates.</p> <p>The intention is that this interactive manual will be specifically used as follows:</p> <p>Non-master versions to be issued to all staff members for their own non-compliance breach recording throughout the year, in</p>	Senior Analyst	<p>Master Compliance Manual working version to be complete by 31/01/2024.</p> <p>Team Meeting by 28/02/2024</p>

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		<p>preparation of annual compliance reports.</p> <p>A master version kept in Amanda Energy's Procedures drive, which is to be updated by senior analyst (or whoever is predominantly responsible for compliance reporting) when new / amended legislation occurs.</p> <p>Master version also to be cross referenced when any relevant procedures are created or updated. For example, if the disconnection procedure is to be updated, the Master Compliance Manual will need to be "Searched" for any reference to "Disconnection" to ensure all latest compliance requirements have been checked.</p> <p>A post-audit (ERL and GTL) internal compliance session will be held in early 2024 when both audits are complete, to discuss as a team the non-compliances identified to improve organisational awareness. This session will be an opportunity to demonstrate how to best utilise the Master Compliance Manual and expectations around reporting.</p> <p>ACTIONS:</p>		

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		<ul style="list-style-type: none"> - Finalise development of a Master Compliance Manual - Update AE Procedure Template to include reference to the Master Compliance Manual (must be searched prior to publication of new or amended procedures) - Update Induction Manual to include reference to Compliance Manual as a reporting tool - Schedule Post-Audit Compliance Outcome team meeting and training session. - Issue non-master Compliance Manuals to all current staff - Schedule for all staff in Outlook a recurring date by which non-master Compliance Manuals are to be ready for annual Compliance Report review. 		