

# ERL 1 – Post Audit Implementation Plan December 2023

Rec Reference	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action and Responsible Officer	Implementation Date
01/2023	<p><b>B/3 - Compliance Obligation–155A Code of Conduct 2022, clause 21(1)</b></p> <p>This compliance obligation was self-reported by Synergy as non-compliant in the Annual Compliance Report of 2021-2022 and 2022-2023 as incorrect information such as supply dates, Renewable Energy Buyback Scheme (REBS) or Distributed Energy Buyback Scheme (DEBS) information, tariff details, fees and charges, supply/ mailing address, customer name, credit details, type of concessions was provided on customer bills.</p> <p>The non-compliances were due to agent error and customers were impacted as they were overcharged/ undercharged in some instances. In some other instances, the customers did not have the correct credit/ concession information displayed on their bills. We further noted that bills were corrected as soon as the discrepancies were identified.</p> <p>Our assessment confirmed that there are improved training programs for agents to minimise such cases in future, and weekly meetings are conducted to discuss compliance issues with Synergy's strategic business partner to confirm that training was completed by agents. We have noted a compliance rate of over 99.99% out of over two (2) million Renewable Energy</p>	<p><b>Recommendation</b></p> <p><b>01/2023</b> - Synergy should review the billing logic configuration in the SAP billing system to ensure that customer bills correctly represent billing information in accordance with regulatory requirements. Once reviewed, update the system configuration, as required to ensure that customer bills are correctly processed with the SAP billing system.</p>	<p><b>Management response</b></p> <p>Synergy commenced a billing improvement project in October 2023 with the objective of delivering billing technical changes and improved billing governance. The project involves representatives from the Customer, Governance, Digital and Technology business units. Project deliverables include SAP billing system enhancements, improved traceability between SAP functionality and regulatory requirements, creation of journey maps to identify and document utility business processes and services managed in SAP, updated documented billing change procedures and greater role clarity for decision making purposes.</p> <p><b>Responsible managers</b></p> <p>David Thomasson, Head of IT Core Systems, Digital and Technology</p> <p>Gordon Mason, Head of Customer Projects and Enablement, Customer</p> <p>Simon Thackray, Head of Regulation and Compliance, Governance</p>	<p>Project completion is scheduled for March 2024</p>

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	<p>Buyback Scheme (REBS) or Distributed Energy Buyback Scheme (DEBS) bills issued every year.</p> <p>Also, through our review of 10 sample bills, we noted that correct information was provided on customer bills.</p>			
02/2023	<p><b>B/2 - Compliance Obligation – 189 Code of Conduct 2018, clause 5.3</b></p> <p>This compliance obligation was self-reported by Synergy as non-compliant in the Annual Compliance Report of 2021-2022 and 2022-2023, where customers who had a direct debit arrangement established on their account did not provide their verifiable consent to establish a direct debit facility. The non-compliance occurred due to an agent error, where an agent did not read the required direct debit declaration to obtain the customer's verifiable consent to enter into a direct debit arrangement.</p> <p>We understand that there are improved training programs for agents to minimise such cases in future and compliance performance is being tracked to address such issues on a periodic basis. We have noted a compliance rate of over 99.99% out of approximately 1 million customers managed by Synergy every year.</p> <p>Also, through our review of one (1) sample direct debit facility activated for a customer, we noted that verifiable customer consent was obtained in line with the Code of Conduct 2018.</p>	<p>Synergy should implement greater speech analytical capability in new telephony system scheduled to be released in November 2023 to detect if the consent is appropriately obtained by agents and corrective actions should be taken where consent has not been obtained. This should reduce the occurrence of failing to obtain consent before applying direct debit arrangements for customers and effectively monitor compliance with obtaining consent.</p>	<p><b>Management response</b></p> <p>Synergy's new telephony system, Genesys, went live in November 2023. Whilst, Synergy's new telephony system possesses a speech analytics capability and is currently being utilised, Synergy will also be looking to implement controls beyond the audit recommendation to ensure that Synergy captures customer consent reliably in line with compliance obligations.</p> <p>Synergy will commence a project to discover and provide a solution that ensures sufficient controls are met. The project will be run out of the Customer Technologies team and will require both Genesys and SAP development. The project will be delivered in May 2024.</p> <p><b>Responsible manager</b></p> <p>Clint Chester, Manager, Customer Integration Platforms, Digital and Technology</p>	May 2024