



# Wesfarmers Kleenheat Gas Pty Ltd Gas Trading Licence GTL 10, Performance Audit Report

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19 November 2012

## Performance Audit Trading Licence GTL 10

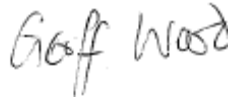
The fieldwork on the performance audit of Gas Trading Licence GTL 10 for the audit period 1 February 2011 to 31 August 2012 is complete and I am pleased to submit the report to you.

In my opinion, except for matters referred to in the report: the Licensee maintained control procedures in relation to the Trading licence GTL10 for the audit period based on the relevant clauses referred to within the scope section of this report.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Gas Trading Licence GTL10 for the audit period on the relevant clauses referred to within the objectives section of this report. Consistent with the scope limitation, the reports are accurate.

In my opinion, the Licensee has maintained a reasonable level of compliance with the licence conditions as the audit disclosed only 4 non compliances which indicates the licensee has made significant improvements in the level of compliance since the previous audit.

Yours sincerely



Geoff Wood

Achieve It Consulting

19 November 2012

## TABLE OF CONTENTS

1	EXECUTIVE SUMMARY	page 4
	Business Background	
	Audit Conclusion	
1.1	PERFORMANCE AUDIT SUMMARY	Page 5
1.2	LIMITATION OF SCOPE	Page 6
2	PERFORMANCE AUDIT	Page 6
2.1	PERFORMANCE AUDIT SCOPE	Page 6
2.2	PERFORMANCE AUDIT OBJECTIVE	Page 6
2.3	PERFORMANCE AUDIT METHODOLOGY	Page 7
3	AUDIT RESULTS AND RECOMMENDATIONS	Page 8
3.1	SUMMARY OF SIGNIFICANT RESULTS	Page 9
3.2	AUDIT EVIDENCE	Page 9
3.3	RECOMMENDATIONS FROM THE PREVIOUS AUDIT	Page 10
3.4	SUGGESTIONS FOR IMPROVEMENT FROM PREVIOUS AUDIT	Page 28
3.5	COMPLIANCE OBLIGATIONS REQUIRING CORRECTIVE MEASURES	Page 32
3.6	SUGGESTIONS FOR IMPROVEMENT	Page 34
3.7	POST AUDIT IMPLEMENTATION PLAN	Page 37
	APPENDIX 1- PERFORMANCE AUDIT DETAILS	Page 38
	APPENDIX 2 COMPLIANCE SUMMARY	Page 136

## 1 EXECUTIVE SUMMARY

Wesfarmers Kleenheat Pty Ltd engaged Achieve It Consulting to undertake the Performance Audit as required by the Economic Regulation Authority (Authority) under the Trading Licence GTL10. This report contains the audit findings for the performance audit.

Section 11ZA of the *Energy Coordination Act 1994* requires as a condition of every 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 conducted by an independent expert acceptable to the Authority.

The Performance Audit has been conducted in order to assess the licensee's level of compliance with the conditions of the licence.

The Authority approved the appointment of Achieve It Consulting in September 2012 and subsequently required the development of an audit plan for approval by the Authority. An audit plan was prepared for the Trading Licence Performance audit and approval of the audit plan was provided in October 2012.

The audit has been carried out in accordance with the plan approved by the Authority and the process flowchart for performance/operational audits as detailed in the Audit Guidelines - Electricity, Gas and Water Licences August 2010.

The period covered by the audit is 1 February 2011 to 31 August 2012 and this report details the outcome of the audit.

### **Business background**

Wesfarmers Kleenheat Gas Pty Ltd is a national company that supplies Liquefied Petroleum Gas (LPG) from cylinders and also supplies gas to customers from distribution systems that it owns and operates. In Western Australia Wesfarmers Kleenheat Gas Pty Ltd has a Gas Trading licence (GTL10) issued by the Authority under the provisions contained in the *Energy Coordination Act 1994*. Trading Licence GTL10 allows Wesfarmers Kleenheat Gas Pty Ltd to retail LPG to customers supplied from distribution systems in Oyster Harbour (Albany) and Margaret River.

### **Audit conclusion**

The Performance Audit has been conducted in order to assess Wesfarmers Kleenheat Gas Pty Ltd's level of compliance with the conditions of its Trading Licence GTL10. Using the methodology outlined in the Audit Plan and assessment and testing of the control environment, the information systems, control procedures and compliance attitude, the auditor has gained a reasonable assurance that Wesfarmers Kleenheat Gas Pty Ltd has complied with its Trading licence during the audit period.

The auditor considers the control environment has improved and overall the understanding of the requirements of the trading licence and associated codes is better understood by the licensee's personnel. A number of key documents have either been reviewed /completed and implemented including the hardship policy. This has assisted the licensee to meet a number of obligations contained in the Authority's compliance manual that were found to be non-compliant during the previous audit.

Unfortunately during the audit period the Reticulation Manager left the company however, the Reticulation Manager was responsible for implementing a number of processes which have improved the control environment.

During the audit period 1 February 2011 to 31 August 2012, in my opinion the licensee has complied with its Trading Licence, and the obligations contained in the Gas Compliance Reporting Manual November 2010. There are 4 non-compliances which are need to be rectified. One of the non-compliances relates to a lack of understanding of the content of the Gas Marketing Code of Conduct (GMCOC) two relate to the omission of information provided on a bill when it is estimated and the final non-compliance relates to the annual Compliance Report to the Authority not being submitted within the required timeframe..

The licensee is still to ensure that staff are provided with training to familiarise them with the requirements of the GMCOC. The circular recommended in the previous audit was prepared and forwarded to staff and although its circulation has increased the general awareness of the GMCOC the required training has still to occur to ensure customer service staff have the required level of knowledge of code. The training was still outstanding at the time the audit was carried out.

As the definitions in the GMCOC are broad, liaison over establishing the gas connection and account have been considered to be marketing activities for the purpose of the audit. However, the audit has shown that the licensee does not undertake direct marketing in regard to the reticulation systems. As the systems already exist and service new subdivisions the only additional customers are the owners of newly constructed homes or existing homes on line of main. For new homes the approach for gas is via a builder or gasfitter to the licensee and for existing homes the approach is from the owner. The licensee's only involvement is to arrange for the account to be established and the property to be provided with gas.

The non-compliances relating to the provision of information on the bill highlighted in the previous audit has been rectified and the bill is now compliant. However, the estimated bills sent to customers are non-compliant and need modifying to include a reference that the bill is estimated and that the licensee will if requested tell the customer the basis of the estimation and the reason.

The final non-compliance relates to the submission of the Annual Compliance Report to the Authority by the required date. In 2011 the report was provided within the required timeframe but due to key personnel leaving the company during 2012 the 2012 report was not provided within the required timeframe although all the relevant information was available.

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

## **1.1 PERFORMANCE AUDIT SUMMARY**

A comprehensive report of the audit findings as applicable to the Gas Compliance Reporting Manual November 2010 is included in Appendix 1 and Appendix 2 contains a summary of the compliance rating for each obligation.

**Table 1 Operational/performance compliance rating scale**

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY NON-COMPLIANT	1	Significant weaknesses and/or serious action required
	Na	Not Applicable
	Nr	Not Rated

**Note** - Where an obligation was not exercised in the audit period, it was not possible to form an opinion about compliance and the item was not rated.

## **1.2 LIMITATION OF SCOPE**

The review was undertaken by examination of documents, interviews with key persons and observations and was not a detailed inspection of physical items.

## **2.0 PERFORMANCE AUDIT**

### **2.1 PERFORMANCE AUDIT SCOPE**

The scope of the audit is to:

- Assess the licence holders internal compliance systems; and
- assess the licence holders compliance with its licence

for the period 1 February 2011 to 31 August 2012. The time period over which this audit was conducted was October 2012 to 20 November 2012.

A previous audit was conducted for the period 1 February 2009 to 31 January 2011 and the obligations that required attention by the licensee from that audit are revisited in this audit.

As there were no performance standards defined within the Trading Licence the obligations contained in the Authority's Gas Compliance Reporting Manual November 2010 were used as the performance criteria for assessing compliance.

The following people were interviewed during the Performance Audit:

- Sally Birch, Team Leader Credit – Funds Management & Reticulation
- Tom Hutton, National Maintenance Manager
- Lorraine Rego, Customer Service Team Leader

### **2.2 PERFORMANCE AUDIT OBJECTIVE**

The objective of the Performance Audit, as defined by the Audit guidelines, is to assess the effectiveness of the measures taken by the licensee to meet the obligations of the performance and quality standards referred to in the licence.

In addition to compliance requirements, a specific focus is to be taken on the systems and effectiveness of processes used to ensure compliance with the standards, outputs and outcomes required by the licence. The audit outcome is to both identify areas of non-compliance and areas of compliance where improvement is required and to recommend corrective action as necessary.

The Audit was conducted in three phases as defined in the Audit Guidelines. The phases and the appropriate audit guide/tool are detailed in table below:

**Table Performance Audit Methodology and Allocated hours**

<b>Phase</b>	<b>Auditor</b>	<b>Hours</b>	<b>Relevant Auditing Standard</b>
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	G Wood	30	ASA 300 replaces AUS 302: Planning ASA 315 replaces AUS 402: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	G Wood	30	AUS 810: Special Purpose Reports on Compliance summary of Control Procedures
3. Fieldwork and Report Preparation Assessment and testing of; <ul style="list-style-type: none"> <li>• The control environment</li> <li>• Information system</li> <li>• Compliance procedures</li> <li>• Compliance attitude</li> </ul>	G Wood	70	AUS 502: Audit Evidence AUS 806: Performance Auditing

## **2.3 PERFORMANCE AUDIT METHODOLOGY**

A risk assessment, assessment of the control environment and allocation of audit priorities was undertaken in accordance with the Audit Guidelines-Electricity, Gas and Water licenses August 2010 on each obligation relating to the trading licence of the licensee as contained in the Gas Compliance Reporting Manual November 2010 issued by the Authority. By assessing the licensee's compliance with each of the obligations in the Manual for the audit period the auditor considered it would be possible to form an opinion on the effectiveness of the licensee's performance with its trading licence.

The Gas Compliance Reporting Manual specifically classifies each licence condition according to a compliance rating. As the audit is only related to the Trading licence held by

the licensee the majority of the obligations are either rated moderate or minor for non-compliance.

In accordance with the Audit Guidelines (August 2010, section 9.4.3) the audit plan submitted and approved by the Authority contains for each compliance obligation, licence clause, and legislative instrument a table that identifies the risk assessment and audit priority. This table has been used as the basis for the audit and each obligation has been examined and an assessment made by the auditor on the licensee's compliance with each obligation. The table forms Appendix 1 of this report.

The examination of each obligation was carried out in accordance with the methodology contained in the audit plan and in addition a number of obligations from the previous audit 1 February 2009 to 31 January 2011 that were found to be non-compliant have also been examined.

A sufficient number of bills were examined to ensure that all changes to the information contained in the bill during the audit period were captured.

The interviews and enquiries conducted enabled:

- an understanding of the control environment and the attitude and expertise of the staff to be determined;
- the information systems and processes employed to maintain compliance with the licence conditions to be examined and their effectiveness tested; and
- policies and procedures that support the licence obligations to be examined.

### 3.0 AUDIT RESULTS AND RECOMMENDATIONS

The results of the audit are summarised below.

Assessment	Audit Priority 1	Audit priority 2	Audit priority 4	Audit priority 5	Totals
Compliant 5	0	2	77	26	105
Compliant 4	0	0	1	2	3
Compliant 3	0	1	1	0	2
Non-compliant 2	0	0	2	0	2
Significantly non-compliant 1	0	0	2	0	2
Not Rated	0	1	60	44	105
Not Applicable	0	0	3	5	8



### 3.1 SUMMARY OF SIGNIFICANT RESULTS

There are 4 non-compliances which need to be rectified, two are rated at significantly non-compliant 1 and the other two are rated at non-compliant 2.

The non-compliances rated as 1 are items 161 and 162 and relate to the provision of information on estimated bills sent to customers. Estimated bills need modifying to include a reference that the bill is estimated and that the licensee will if requested tell the customer the basis of the estimation and the reason.

Item 116 is the first non-compliance rated as 2 and relates to the Gas Marketing Code of Conduct (GMCOC). The licensee is still to ensure that staff are provided with training to familiarise them with the requirements of the GMCOC. Although the circular recommended in the previous audit was prepared and forwarded to staff has increased the general awareness of the GMCOC the required training has still to occur and be included in the induction training for new staff. The training was still outstanding at the time the audit was undertaken.

As the definitions in the GMCOC are broad, liaison over establishing the gas connection and account have been considered to be marketing activities for the purpose of the audit. However, the audit has shown that the licensee does not undertake direct marketing associated with the reticulation systems. As the systems already exist and service new subdivisions the only additional customers are the owners of newly constructed homes or existing homes on line of main. For new homes the approach for gas is via a builder or gasfitter to the licensee and for existing homes the approach is from the owner or their gas fitter. The licensee's only involvement is to arrange for the account to be established and the property to be provided with gas by the distributor. Consideration should therefore be given to discussions occurring between the licensee and the Authority to clearly establish if marketing is undertaken by the licensee.

The final non-compliance rated 2 is item 102 and relates to the submission of the Annual Compliance Report to the Authority by the required date. In 2011 the report was provided within the required timeframe but due to key personnel leaving the company during 2012 the 2012 report was not provided within the required timeframe although all the relevant information was available. The licensee needs to improve the process for ensuring the reports are submitted by the required date.

### 3.2 AUDIT EVIDENCE

The following evidence was gathered for the audit.

1. Legislation and standards
  - *Energy Coordination Act 1994*
  - *Gas Standards Act 1972*
  - *Energy Coordination (Customer Contracts) Regulations 2004*
  - *AG 755 1998 Natural Gas Customer Service Code*
  - Gas Customer Code
  - Gas Marketing Code of Conduct
  - Gas Trading Licence GTL10

## 2. Licensee's documents

- Annual report for balance sheets and financial indicators
- Prospective customers package
- Customer safety awareness program
- Customer service charter
- Small Use Gas Supply Agreement Terms and Conditions
- Complaints handling Manual and policy
- OMS Document Register
- Annual information returns
- Customer Bills
- Hardship Policy
- Disconnection Procedure
- Disconnection and Final notice

### 3.3 RECOMMENDATIONS FROM THE PREVIOUS AUDIT

<b>Item 1</b> Trading Licence Clause 4.1	<b>Compliance Rating</b> Non-Compliant – 2
<i>Energy Coordination Act section 11Q(1-2)</i> The requirement is that a Licensee must pay the applicable fees in accordance with the Regulations. (Energy Coordination (Licensing Fees) Regulations Clause 4 & 5).	
<b>Corrective Action</b>  Licensee to implement a process that ensures payment within the required period rather than in accordance with their standard payment period.	
<b>Action taken since last audit</b>  Process has been implemented and invoice for licence fee paid within required time frame. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 57</b> Trading Licence Clause 5.1	<b>Compliance Rating</b> Non-Compliant – 2
<i>Energy Coordination (Customer Contracts) Regulation 14(3) AGA Code Clause 4.1.2.1 &amp; 4.1.2.2</i> A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.	
<b>Corrective Action</b>  Customer to be provided with notice describing the tariff charged at the time of becoming a customer and each time the tariff changes.	
<b>Action taken since last audit</b>  No request was received from a customer during the audit period for information on the tariff charged. However all new customers are provided information on the tariff in the welcome letter.	

All customers have also been provided in writing information on a proposed change to the tariff from September 2012. . The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 60</b>	Trading Licence Clause 5.1	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 &amp; 4.2.3.3</i>		
A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.		
<b>Corrective Action</b>		
The bill format to be revised to comply with the requirements of the AGA code which require the following to be included: amount of arrears or credit, information on meter testing and the availability of interpreter services.		
<b>Action taken since last audit</b>		
The bill format and information contained in the bill has been changed during the audit period and now contains all the information required in the AGA code. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 73</b>	Trading Licence Clause 5.1	<b>Compliance Rating</b> Non-Compliant – 2
<i>Energy Coordination (Customer Contracts) Regulation 27(4) &amp; 40(3)</i>		
A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.		
<b>Corrective Action</b>		
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved, including the action to be taken if a customer queries a contract.		
<b>Action taken since last audit</b>		
The licensee does not engage in door to door marketing. The initial approach is always from a builder or person who wants to use gas from the reticulation system. However, given that the definition regarding marketing in the code could include telephone conversations with a potential customer regarding setting up an account the customer is provided with a 10 day cooling off period.		
The small use contract terms and conditions provide for the contract to be cancelled during a 10 day cooling off period. The necessary action has therefore been taken to rectify the non-compliance..		

<b>Item 80</b>	Trading Licence Clause 5.1	<b>Compliance Rating</b> Non-Compliant – 2
<i>Energy Coordination (Customer Contracts) Regulation 44</i>		
When a non-standard contract is due to expire a licensee must issue a notice in writing to a customer at least 2 months prior to the expiry date (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.		

**Corrective Action**

Licensee to implement a process that ensures the customer is provided with the required information in the required time frame.

**Action taken since last audit**

As the previous audit found that the process was not being followed the licensee has now implemented a process that will ensure the obligation is satisfied. The process has yet to be tested as the licensee has only one customer who is subject to a non-standard contract. The action taken by the licensee and the increase in awareness of the obligation would indicate that the obligation will be complied with in the future and as such action has been taken to rectify the non-compliance.

<b>Item 82</b>	Trading Licence Clause 14.1	<b>Compliance Rating</b> Non-Compliant – 2
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*Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(2)*

A licensee must from time to time provide the customer with advice with their bill that a customer service charter is available free of charge.

**Corrective Action**

Licensee to implement a process for providing advice with a customer's bill from time to time that a customer service charter is available free of charge. This should be achieved by including the information on the bill.

**Action taken since last audit**

The licensee has made changes to the bill that include a reference that a customer service charter is available free of charge. Now compliant. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 106</b>	Trading Licence Clause 12.2	<b>Compliance Rating</b> Non-Compliant – 2
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*Energy Coordination Act section 11M*

A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.

**Corrective Action**

Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.

**Action taken since last audit**

The Authority formally requested the licensee to review their standard contract during the audit period and the licensee complied and submitted the revised contract for approval to the Authority within the required time frame. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 107</b>	Trading Licence Clause 12.3	<b>Compliance Rating</b> Non-Compliant – 2
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*Energy Coordination Act section 11M*

A licensee must comply with any direction given by the Authority in relation to the scope, process

and methodology of the standard form contract review.
<b>Corrective Action</b> Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.
<b>Action taken since last audit</b> The Authority formally requested the licensee to review their standard contract during the audit period and the licensee complied and submitted the contract for approval to the Authority. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 114</b>	Trading Licence Clauses 19.1	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP</i>		
The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.		
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b> Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the training is still outstanding. Although awareness of the requirements of the code have increased for the licensee to fully comply with the code the training needs to be completed. Until this occurs this obligation is still non-compliant.		

<b>Item 115</b>	Trading Licence clause 19.2	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M and 11ZPP</i>		
A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .		
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b> Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the training is still outstanding. Although awareness of the requirements of the code		

have increased for the licensee to fully comply with the code the training needs to be completed.

<b>Item 116</b> Trading Licence Clause 19.1	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A marketer must ensure that its marketing representatives comply with Part 2 of the Code of Conduct.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	
<b>Action taken since last audit</b> The licensee is in the most part complying with Part 2 of the code as part of their normal business processes. However, staff need to be trained to ensure they fully understand the code and how to comply. This obligation is still non-compliant as the training is still outstanding.	

<b>Item 117</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	
<b>Action taken since last audit</b> Examined process for connecting new customer to the reticulation system and satisfied that the above obligation is complied with in spite of the lack of training in the code. . The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 118</b> Trading Licence clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

**Action taken since last audit**

Examined process for connecting new customer to the reticulation system which has been amended since the last audit and satisfied that the above obligation is complied with. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 119</b>	Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<b>Licence:</b> <i>Trading</i>		
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)</i>		
Where a standard form contract is not entered into as a result of door to door marketing or for a non-standard contract initiated by telephone, a marketing representative must obtain and make a record of the customer's verifiable consent that the specified information has been given.		
<b>Corrective Action</b>		
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b>		
Examined process for connecting new customer to the reticulation system which has been amended since the last audit and satisfied that the above obligation is complied with and relevant records kept. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 120</b>	Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(3)</i>		
Where a standard form contract is entered into as a result of door to door marketing or for a non-standard contract (other than that initiated by the customer by telephone or electronic means), a marketing representative must obtain the customer's written acknowledgement that the specified information has been given.		
<b>Corrective Action</b>		
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b>		
Examination of the process followed by the licensee revealed only standard form contracts are offered to customers who wish to connect to the reticulation system and in all instances the approach is made either by a builder or the customer to the licensee therefore no door to door marketing is undertaken by the licensee. In all instances customers are provided with information about the supply of LPG but do not require the customer's written acknowledgement. This obligation is considered not to apply to the licensee and therefore requires no further action.		



<b>Item 122</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i></p> <p>Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.</p>	
<p><b>Corrective Action</b></p> <p>Licensee to provide the following information as required under the Gas Marketing Code of Conduct:</p> <p>(a) how the <i>customer</i> may obtain –</p> <ul style="list-style-type: none"> <li>(i) a copy of the <i>retailer's Customer Service Charter</i>;</li> <li>(ii) a copy of the <i>Code</i>; and</li> <li>iii) details on all relevant tariffs, fees, charges, <i>alternative tariffs</i> and service levels that may apply to the <i>customer</i>;</li> </ul> <p>(b) the scope of the <i>Code</i>;</p> <p>(c) that a <i>retailer, distributor, marketer</i> and <i>marketing representative</i> must comply with the <i>Code</i>;</p> <p>(d) how the <i>retailer</i> may assist if the <i>customer</i> is experiencing <i>payment difficulties</i> or <i>financial hardship</i>;</p> <p>(e) the <i>concessions</i> that may apply to the <i>customer</i>;</p> <p>(f) the <i>distributor's</i> 24 hour telephone number for faults and emergencies;</p> <p>(g) how the <i>customer</i> may access the <i>retailer's</i>:</p> <ul style="list-style-type: none"> <li>(i) multi-lingual services (in languages reflective of the <i>retailer's customer</i> base); and</li> <li>(ii) <i>TTY</i> services;</li> </ul> <p>(h) how to make an enquiry of, or <i>complaint</i> to, the <i>retailer</i>;</p> <p>(i) general information on the <i>retailer's gas customer safety awareness programme</i>; and</p> <p>(j) the details of any right the <i>customer</i> may have to rescind the <i>contract</i> during a <i>cooling-off period</i> and the charges that may apply if the <i>customer</i> rescinds the <i>contract</i>.</p>	
<p><b>Action taken since last audit</b></p> <p>The licensee as part of the account setting up process provides the above information to the customer. The necessary action has therefore been taken to rectify the non-compliance.</p>	

<b>Item 123</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(3)</i></p> <p>In circumstances where a standard form contract is not entered into as a result of door to door marketing, a retailer or marketing representative must give the specified information no later than with or on the customer's first bill and a copy of the contract if requested by the customer (and the customer has not previously received a copy).</p>	
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	
<p><b>Action taken since last audit</b></p> <p>The licensee provides the specified information to the customer in the welcome pack within the required time frame. The necessary action has therefore been taken to rectify the non-compliance.</p>	



<b>Item 124</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(4)</i></p> <p>In circumstances where a standard form contract is entered into as a result of door to door marketing or a non-standard contract, a retailer or marketing representative must give the specified information and a copy of the contract before the customer has entered into the contract and must obtain a written acknowledgement that the information has been given.</p>	
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	
<p><b>Action taken since last audit</b></p> <p>All requests for connection to the reticulation system are made by a builder or a customer. The licensee does not make contact with the customer in an attempt to try and get them to connect to the reticulation system. Therefore the licensee does not engage in door to door marketing and as such this obligation does not apply.</p>	

<b>Item 125</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i></p> <p>A marketing representative must not, when marketing, engage in conduct that is misleading, deceptive or likely to mislead or deceive or that is unconscionable.</p>	
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	
<p><b>Action taken since last audit</b></p> <p>The licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. Once an approach is made to the licensee the customer service representative complies with the above obligation. The necessary action has therefore been taken to rectify the non-compliance.</p>	

<b>Item 126</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)</i></p> <p>A marketing representative must not exert undue pressure on a customer, nor harass or coerce a customer.</p>	
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	
<p><b>Action taken since last audit</b></p> <p>The licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. Once an approach is made</p>	

to the licensee the customer service representative complies with the above obligation. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 128</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(4)</i> A marketing representative must ensure that all standard form contracts that are entered into as a result of door to door marketing and all non-standard contracts are in writing.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	
<b>Action taken since last audit</b> Examination of the licensee's process has shown the licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. The licensee only provides a copy of the contract if requested by the customer. The contract can also be viewed on the licensee's website.. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 129</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(5)</i> A marketer must ensure that a customer is able to contact the marketer on the marketer's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	
<b>Action taken since last audit</b> As part of the functions of the customer service team following contact being made by a potential customer information is provided to enable the potential customer or builder to contact the licensee for any matters relating to gas supply. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 130</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(1)</i> A marketing representative must provide the information specified to the customer when marketing by means other than face to face and after having identified the purpose of the contact, if the contact is not by electronic means, the marketing representative must ask the customer whether they wish to proceed further.	
<b>Corrective Action</b>	

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Action taken since last audit**

The licensee complies with this requirement as part of dealing with a potential customer. As stated previously the initial contact is made by the builder or customer to the licensee. The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 131</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(2)</i>		
A marketing representative must, on request, provide the customer with its and the retailer's complaints telephone number and marketing identification number.		
<b>Corrective Action</b>		
All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b>		
The licensee has in place a process to provide this information through the customer service team. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 136</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(7) &amp; 2.6(8)</i>		
Except in response to a customer request or query, a marketer must keep the specified records each time it initiates contact with a customer for the purposes of marketing.		
<b>Corrective Action</b>		
All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
The licensee to implement a process to record the information required under clause 2.6(7) and 2.6(8).		
<b>Observations</b>		
When discussing issues regarding a gas connection and setting up an account following an initial approach by a builder or potential customer (property on line of main), the required records are kept. This would satisfy this obligation if it is considered to be marketing. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 137</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(1)</i>		
Where the customer requests not to be contacted for the purposes of marketing a marketer must ensure that a customer is not contacted on its behalf in relation to the supply of gas for a period of		

<p>two years unless:</p> <ul style="list-style-type: none"> <li>○ the customer requests contact; or</li> <li>○ the customer has moved premises; or</li> <li>○ a marketer has a legal obligation to contact the customer.</li> </ul>
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>
<p><b>Action taken since last audit</b></p> <p>The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. The licensee needs to make the customer service staff are aware of the need to comply with this obligation as part of the training if following contact from a customer the customer decides not to proceed with a gas supply from the reticulation system. Training to be completed to ensure compliance..</p>

<b>Item 138</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(2)</i>		
A marketer must keep a record of each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request.		
<p><b>Corrective Action</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p> <p>Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.</p>		
<p><b>Action taken since last audit</b></p> <p>The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. The licensee needs to make the customer service staff are aware of the need to comply with this obligation as part of the training if following contact from a customer the customer decides not to proceed with a gas supply from the reticulation system. Training to be completed to ensure compliance..</p>		

<b>Item 139</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(3)</i>		
A marketer must give a copy of the record to the Gas Ombudsman or the Authority on request.		
<b>Corrective Action</b>		

Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.

**Action taken since last audit**

The process for recording each customer who requested not to be contacted has been implemented and includes a provision regarding providing the information to the Gas Ombudsman or the Authority on request. Unfortunately as no such requests have been received it has not been possible to verify the adequacy of the process. However, as the process has been put in place no further action is required other than to complete the training in the code.

<b>Item 140</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
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*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(4)*

A marketer must provide the customer on request with written confirmation that the customer will not be contacted for the next two years.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Action taken since last audit**

The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. As part of the training of customer service staff the licensee needs to make them aware of the need to comply with this obligation should such a circumstance arise. Training is therefore still to be carried out and if considered appropriate, following discussions with the Authority, a process put in place to ensure compliance.

<b>Item 143</b> Trading Licence Clause 19	<b>Compliance rating</b> Non-compliant-1
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*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(1)*

A marketer must keep a record of each complaint made by a customer or a person contacted for the purposes of marketing and, on request, gives all information relating to the complaint to the Gas Ombudsman.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Action taken since last audit**

As the licensee does not contact customers for the purpose of marketing this obligation does not apply. The customer or the builder contacts the licensee to request connection and if a connection is possible the licensee arranges the connection and the setting up of the gas account. However, should a customer complaint be received during or after contact with a customer service team representative the details would be recorded and the appropriate action taken to resolve the issue to allow all the information to be provided to the Gas Ombudsman on request.

The necessary action has therefore been taken to rectify the non-compliance.

<b>Item 144</b>	Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i> A marketer must keep a record or other information required by the Code to be kept for at least 2 years.		
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b> The licensee is aware of the information it needs to keep under the code if it engages in marketing and needs to reinforce these obligations as part of the training of customer service staff. Training still to be undertaken to reinforce the requirements of this obligation.		

<b>Item 156</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(1)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must include minimum prescribed information on the customer's bill, unless the customer agrees otherwise.		
<b>Corrective Action</b> The bill to be amended to include the minimum prescribed information required by the code. Until 1 July 2011 the only item missing as required under clause 4.5(1) of the Gas Customer Code is the inclusion of the amount of arrears and credits.		
<b>Action taken since last audit</b> Examination of bills sent at different times during the audit period has shown that following the amendments made in June 2012 the prescribed information items are now included in the bill. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 208</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its hardship policy referred to in clause 6.10(2)(d).		
<b>Corrective Action</b> Hardship policy to be finalised and implemented.		
<b>Action taken since last audit</b> The licensee has a hardship policy that complies with clause 6.10(2)(d) of the Customer Code and refers to the policy when considering a request by a customer, or a relevant consumer representative organisation, for a reduction of the customer's fees, charges, or debt. The		

necessary action has therefore been taken to rectify the non-compliance.

<b>Item 213</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(1)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.		
<b>Corrective Action</b> Hardship policy to be finalised and implemented.		
<b>Action taken since last audit</b> Hardship policy has been implemented and the Authority has assessed the policy for compliance and publish the results of the assessment. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 214</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(2)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must ensure that the hardship policy complies with the specified criteria.		
<b>Corrective Action</b> Hardship policy to be finalised and implemented.		
<b>Action taken since last audit</b> Hardship policy has been implemented and the Authority has assessed the policy for compliance and publish the results of the assessment. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 215</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must give residential customers, financial counsellors and relevant consumer representative organisations, details of the financial hardship policy, at no charge. The retailer must provide all residential customers experiencing financial hardship details of the hardship policy.		
<b>Corrective Action</b> Hardship policy to be finalised and implemented		
<b>Action taken since last audit</b> Details on the Hardship policy have been made available to residential customers, financial counsellors and relevant consumer representative organisations at no charge. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 216</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(4)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the specified information related to the hardship policy.		
<b>Corrective Action</b> On completion of the Hardship policy and its implementation the specified information required in the Gas Customer Code is to be recorded.		
<b>Action taken since last audit</b> Record of specified information relating to the Hardship policy is available. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 217</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must, unless notified in writing by the Authority, review its hardship policy at least annually and submit the review to the Authority within 5 business days after it is completed.		
<b>Corrective Action</b> As part of the process of developing the hardship policy the licensee is to include a process for reviewing the policy and submitting it to the authority in the required time frame.		
<b>Action taken since last audit</b> The hardship policy was reviewed in 2012 and submitted to the Authority within the required time frame. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 218</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.		
<b>Corrective Action</b> The licensee is to have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy		
<b>Action taken since last audit</b> The policy has been reviewed and as part of the review the Authority's Financial Hardship Policy Guidelines were utilised. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 229</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(1)	Compliance Rating Non-Compliant – 2
<i>Energy Coordination Act section 11M</i> A retailer must give notice of any variations in its tariffs to each of its customers affected by a		



variation, in the timeframes specified.
<b>Corrective Action</b> The licensee to ensure it has in place a process for giving notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified
<b>Action taken since last audit</b> <p>No variation in tariffs took place during the audit period.</p> <p>However, the licensee is intending to vary the tariff in the near future and is following the required process to ensure that notice of any variations in its tariffs to each of its customers affected by a variation, is provided within the timeframes specified. The necessary action has therefore been taken to rectify the non-compliance.</p>

<b>Item 246</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	<b>Compliance Rating</b> Non-Compliant – 2
<i>Energy Coordination Act section 11M</i> A retailer and, where appropriate a distributor, must include the telephone number for their special information services and for independent multi-lingual services and the National Interpreter Symbol, with the words “Interpreter Services’, on the documents specified.	
<b>Corrective Action</b> The bill to include the telephone number for independent multi-lingual services and National Interpreter Symbol.	
<b>Action taken since last audit</b> A sample of bills confirmed that the licensee provides the information on the documents specified. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 251</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	<b>Compliance rating</b> Non-compliant-1
<i>Energy Coordination Act section 11M</i> A retailer, distributor and marketer must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	
<b>Corrective Action</b> Complaints manual to be amended to include information on how a customer on request, at no charge, gets information that will assist the customer in utilising the respective complaints handling processes and a brochure developed for handing to the customer.	
<b>Action taken since last audit</b> Although no requests for the above information were received during the audit period the licensee has a brochure that sets out this information which would be provided to a customer on request. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 266</b>	Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(3)	Compliance Rating Non-Compliant – 2
<i>Energy Coordination Act section 11M</i> A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.		
<b>Corrective Action/Opportunity for Improvement</b> Process to be developed by licensee for submitting the report directly to the Minister within the required timeframe.		
<b>Action taken since last audit</b> The process for ensuring that the above requirement is complied with is in place and the 2011 reports were provided within the required time frame. The necessary action has therefore been taken to rectify the non-compliance.		

### September 2009 Gas Compliance Manual

<b>Item 119</b>	Trading Licence clause 21.1 and 21.2 Code of Conduct clause 2.2	Compliance Rating Non-Compliant – 2
<i>Energy Coordination Act section 11ZPP</i> A marketer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified.		
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.		
<b>Action taken since last audit</b> Examined process for connecting new customer to the reticulation system which has been amended since the last audit and satisfied that the above obligation is complied with. The necessary action has therefore been taken to rectify the non-compliance.		

<b>Item 216</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Compliance Rating Non-Compliant – 2
<i>Energy Coordination Act section 11M</i> A retailer must give a customer, financial counsellor or relevant consumer representative organisation, on request, details of the financial hardship policy, at no charge.		
<b>Corrective Action</b> Hardship policy to be finalised and implemented.		
<b>Action taken since last audit</b> The hardship policy has been implemented and the necessary information is provided to the relevant organisations. The necessary action has therefore been taken to rectify the non-compliance.		

### 3.4 SUGGESTIONS FOR IMPROVEMENT FROM PREVIOUS AUDIT

Number in brackets denotes September 2009 compliance manual reference.

<b>Item 2 (2)</b> Trading Licence Clause 12.1	Compliance rating Compliant – 3
<i>Energy Coordination Act section 11WG(1)</i> The requirement is that a Licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.	
<b>Opportunity for Improvement</b>  The licensee should either include a copy of the Small Use Gas Supply Agreement Terms and Conditions in the information pack or on their website. The agreement provides for customer to sign it on the last page signifying they are entering into a legally binding contract. If it is intended that the customer does not need to sign the agreement consideration should be given to removing this section of the document. A number of the clauses in the agreement do not apply in Western Australia and to avoid confusion for the customer consideration should be given to their deletion.	
<b>Action taken</b>  The licensee has included a copy of the Small Use Gas Supply Agreement Terms and Conditions on the website. The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 4 (4)</b> Trading Licence Clause 5.1	Compliance rating Compliant – 4
<i>Energy Coordination Act section 11WK(1-2)</i> Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.	
<b>Opportunity for Improvement</b>  Licensee to consider including small use gas supply agreement in welcome pack and to make a decision on whether the customer should sign the agreement as provided for in the document.	
<b>Action taken</b>  The licensee does not require the customer to sign the small use agreement . The necessary action has therefore been taken to rectify the non-compliance.	

<b>Item 5 (5)</b> Trading Licence Clause 5.1	Compliance rating Compliant- 5
<i>Energy Coordination Act section 11WK(3)</i> A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.	
<b>Opportunity for Improvement</b>	

Consideration to be given to ensuring all customers are provided with a Standard form contract.
<b>Action taken</b>  The licensee has decided not to forward a copy of the agreement to a customer but only to make the customer aware that the agreement can be obtained on request or via the website.

<b>Item 56 (56)</b> Trading Licence Clause 5.1	Compliance rating Compliant – 4
<i>Energy Coordination (Customer Contracts) Regulation 14(2)</i>  A licensee must inform customers that the supply charge is either for residential or non-residential supply; includes a specified fixed component and specified usage component; and describes the circumstances a customer needs to meet to qualify for residential tariffs.	
<b>Opportunity for Improvement</b>  Information that provides details on the makeup of the supply charge to be provided on the bill or in the terms and conditions document	
<b>Action taken</b>  The information sent to the customer in the welcome letter explains the supply charge. The necessary action has therefore been taken to improve compliance.	

<b>Item 58 (58)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 14 AGA Code Clause 4.1.3.1 &amp; 4.1.3.2</i>  A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
<b>Opportunity for Improvement</b>  Process to be put in place to give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
<b>Action taken</b>  A process is now in place to provide this information. The necessary action has therefore been taken to improve compliance.	

<b>Item 72 (72)</b> Trading Licence Clause 5.1	Compliance rating Compliant – 4
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts) Regulation 20(2) AGA Code Clause 4.3.5.1</i>  A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.	
<b>Opportunity for Improvement</b>  Process should be documented.	

**Action taken**

These options are now available and details are contained in the hardship policy. The necessary action has therefore been taken to improve compliance.

**Item 113 (115)** Trading Licence Schedule 3 Clause 3.1

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

A Licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.

**Opportunity for Improvement**

The licensee to put in place a process for notifying the Minister as all previous notifications to the Minister have been by the Authority on behalf of the licensee.

**Action taken**

This process is in place and the Minister has recently been informed by the licensee regarding a tariff change. The necessary action has therefore been taken to ensure compliance.

**Item 121 (123)** Trading Licence Clause 19.1 and 19.2

Compliance rating  
Compliant – 4

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)*

Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must offer to provide the customer with a copy of the contract and, where this offer is accepted by the customer, provide a copy of the contract at that time or as soon as possible thereafter.

**Opportunity for Improvement**

The welcome pack could be improved by including a copy of the small use gas Supply Agreement terms and Conditions.

**Action taken**

The offer is made in the welcome letter and also includes reference to accessing the agreement on the website. The licensee has decided not to provide a copy of the contract in the welcome pack but to just make reference to it being available.

**Item 198 (199)** Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)

Compliance rating  
Compliant – 4

*Energy Coordination Act section 11M*

A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within three business days from when the residential customer informs a retailer that the customer is experiencing payment problems.

**Opportunity for Improvement**

The assessment is left to the discretion of the Team Leader Credit and Funds Management & Reticulation consideration should be given to documenting the process. Hardship Policy to be implemented and form part of the assessment process.

**Action taken**

The process is now documented. The hardship policy has also been implemented. The

necessary action has therefore been taken to improve compliance.

<b>Item 204 (205)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3	Compliance rating Compliant – 4
<i>Energy Coordination Act section 11M</i> A retailer must offer the alternative payment arrangements, and advise the residential customers that additional assistance may be available, in circumstances where a residential customer is assessed as experiencing payment difficulties or financial hardship.	
<b>Opportunity for Improvement</b> Licensee to give consideration to developing a policy or process to assist personnel in dealing with issues of alternative payments assistance etc.	
<b>Action taken</b> A process has been implemented and is supported by the hardship policy. The necessary action has therefore been taken to improve compliance.	

### 3.5 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

<b>Item 102</b> Trading Licence Clause 21.	Compliance rating Compliant-2
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must provide to the <i>Authority</i> any information that the <i>Authority</i> may require in connection with its functions under the <i>Energy Coordination Act 1994</i> in the time, manner and form specified by the <i>Authority</i> .	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined performance report and the annual performance report Examined records to establish when delivery of the reports occurred.	
<b>Observations</b> The licensee provided all information requested during the first year covered by the audit period within the required timeframe. This included the annual compliance report. However, in 2012 the licensee failed to provide the performance audit by the required time. This is due in part to key staff (Reticulation Manager) leaving the organisation and eastern state based personnel having to cover the duties until a replacement can be appointed.	
<b>Compliance summary</b> Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b> Licensee to amend the process it follows in ensuring the information for the report is available and the report is prepared and submitted in accordance with the prescribed timeline.	

<b>Item 116</b> Trading Licence Clause 19.1	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A marketer must ensure that its marketing representatives comply with Part 2 of the Code of	

Conduct.
<b>Verification/Tests</b> Interviewed the Customer Service team Leader
<b>Observations</b> The licensee is in the most part complying with Part 2 of the code as part of their normal business processes. However, staff need to be trained to ensure they fully understand the code and how to comply.
<b>Compliance summary</b> Non-compliant
<b>Corrective Action/Opportunity for Improvement</b> The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable. The training should reflect the outcome of any discussions that occur with the Authority on marketing.

<b>Item161</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(1)	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base		
<b>Observations</b> Estimated bills provided during the audit period but are not provided in the manner specified..		
<b>Compliance summary</b> Non-compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item162</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(2)	Compliance rating Non-compliant -1
<i>Energy Coordination Act section 11M</i> A retailer must specify the stated information in circumstances where the customer's bill is estimated.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills		

<b>Observations</b>
A copy of an estimated bill showed that the licensee does not comply with this obligation
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
The licensee to include on the bill the information required in clause 4.8(2) of the Gas Customer Code which is:  To specify in a visible and legible manner that the bill is estimated and advise the customer that the licensee will tell on request the basis of the estimation; and the reason for the estimation.

### 3.6 SUGGESTIONS FOR IMPROVEMENT

<b>Item 73</b>	Trading Licence Clause 5.1	Compliance rating Compliant -4
<i>Energy Coordination (Customer Contracts)Regulation 27(4) &amp; 40(3)</i>		
A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.		
<b>Verification/Tests</b>		
Interviewed the Retail and Marketing Manager		
<b>Observations</b>		
The licensee does not engage in door to door marketing. The initial approach is always from a builder or person who wants to use gas from the reticulation system.  The small use contract terms and conditions provide for the contract to be cancelled during a 10 day cooling off period.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		
Consideration be given to including reference to a cooling off period in the welcome letter.		

<b>Item 79</b>	Trading Licence Clause 5.1	Compliance rating Compliant-4
<i>Energy Coordination (Customer Contracts)Regulation 50</i>		
A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b> The disconnection and final notice provides information on the energy ombudsman and contains a comment to contact the licensee if they have a complaint.		
<b>Compliance summary</b>		



Compliant
<b>Corrective Action/Opportunity for Improvement</b> The notice should be amended to make reference to the complaints handling process.

<b>Item 114</b>	Trading Licence Clauses 19.1	Compliance rating Compliant-3
<i>Energy Coordination Act section 11ZPP</i> The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.		
<b>Verification/Tests</b> Interviewed the Customer Service team Leader		
<b>Observations</b> Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the auditor has formed the view that the licensee does not fully comply with the Gas Marketing Code of Conduct		
<b>Compliance summary</b> Non-compliant		
<b>Corrective Action/Opportunity for Improvement</b> The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable.		

<b>Item 115</b>	Trading Licence clause19.2	Compliance rating Compliant-3
<i>Energy Coordination Act section 11M and 11ZPP</i> A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .		
<b>Verification/Tests</b> Interviewed the Customer Service team Leader		
<b>Observations</b> Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the auditor has formed the view that the licensee does not fully comply with the Gas Marketing Code of Conduct		
<b>Compliance summary</b> Non-compliant		

**Corrective Action/Opportunity for Improvement**

The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable.

<b>Item122</b> TradingLicenceClause19	Compliance rating Compliant-4
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i> Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader Examined welcome pack and terms and conditions document.	
<b>Observations</b> The licensee provides the required information to the customer as part of the process of signing up a new account.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b> Licensee to review process to ensure it meets this obligation.	

<b>Item144</b> Trading Licence Clause19	Compliance rating Compliant-4
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i> A marketer must keep a record or other information required by the Code to be kept for at least 2 years.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader	
<b>Observations</b> The licensee is aware of the information it needs to keep under the code if it engages in marketing.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b> Training to reinforce the information to be kept and for what period.	

### **3.7 POST AUDIT IMPLEMENTATION PLAN**

The Licensee will provide a post audit implementation plan.

## APPENDIX 1- PERFORMANCE AUDIT DETAILS

### DETAILED AUDIT FINDINGS

The following sets out the audit findings. The obligations are listed as they appear in the November 2010 Gas Compliance Reporting Manual.

#### LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION ACT 1994

<b>Item 1</b> Trading Licence Clause 4.1	Compliance Rating Compliant - 5
<i>Energy Coordination Act section 11Q(1-2)</i> The requirement is that a Licensee must pay the applicable fees in accordance with the Regulations. (Energy Coordination (Licensing Fees) Regulations Clause 4 & 5).	
<b>Verification/Tests</b>  Interviewed National Maintenance Manager  Obtained a copy of the invoice and determined date that invoice was paid	
<b>Observations</b>  Established date when invoice was received and fees were paid.  Licensee received an invoice from the Authority with an issue date of 29/08/2011 and invoice was paid on the 09/09/2011.  This indicates the licensee has a process in place to ensure licence fees are paid within the required time frame as normal business practice is to pay invoices at the end of the month following the month the invoice was received.	
<b>Compliance summary:</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 2</b> Trading Licence Clause 12.1	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11WG(1)</i> The requirement is that a Licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.	
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader  Examined information pack sent to new consumers and Small Use Gas Supply Agreement Terms and Conditions	

Examined the non-standard contract that relates to the only commercial customer.
<b>Observations</b>  Information pack sent to new customers includes a welcome letter that includes a paragraph stating by accepting supply from the licensee the customer agrees to be bound to the terms and conditions contained in the small use gas supply agreement and the document can be obtained by calling the licensee on 132 180 or visiting the licensee's website.  A check on the website showed that the document is not available on the website.
<b>Compliance summary:</b> The licensee is compliant as supply is subject to a contract.
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 3</b>	TradingLicenceClause13.1	Compliance rating Compliant-5
<i>EnergyCoordinationActsection11WG(2)</i> The requirement is that a Licensee must comply with a direction given to the Licensee under section 11WI.		
<b>Verification/Tests</b>  Interviewed National Maintenance Manager  Contacted Authority to determine if the licensee had been provided with a direction to review their standard form contract.		
<b>Observations</b>  The <i>Authority</i> issued a direction requiring the standard form contract be reviewed during the audit period. The direction was complied with and the contract was approved by the Authority.		
<b>Compliance summary:</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 4</b>	Trading Licence Clause 5.1	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11WK(1-2)</i> Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader		

Examined Small Use Gas Supply Agreement Terms And Conditions (contract)
<b>Observations</b>  Customers do not enter into a contract but by receiving the welcome letter accept the terms and conditions contained in the contract.  All new customers are provided with a welcome letter that includes a paragraph that states by accepting supply from the licensee the customer agrees to be bound to the terms and conditions contained in the small use gas supply agreement.
<b>Compliance summary</b>  Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 5</b>	TradingLicenceClause5.1	Compliance rating Compliant-5
<i>Energy Coordination Act section11WK(3)</i> A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader  Examined Small Use Gas Supply Agreement Terms And Conditions (contract)		
<b>Observations</b>  Licensee provides supply to all small use customers in accordance with Small Use Gas Supply Agreement Terms And Conditions. Licensee does not have non-standard contracts for small use customers.		
<b>Compliance summary</b>  Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 6</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11X (3)</i> A licensee must take reasonable steps to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause.		
<b>Verification/Tests</b>  Interviewed National Maintenance Manager		

<b>Observations</b> <p>One major interruption occurred during the audit period in November 2011 through third party damage to the reticulation system that resulted in 300 homes being out of gas for between 24 to 36 hours. The licensee took all reasonable steps to minimise the disruption.</p>
<b>Compliance summary:</b> <p>Compliant.</p>
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 10</b> Trading Licence Clause 18.1	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11ZA(1)</i> <p>The requirement is that a Licensee must provide the <i>Authority</i> with a performance audit by an independent expert acceptable to the <i>Authority</i> within 24 months of commencement and every 24 months thereafter (or longer if the <i>Authority</i> allows).</p>	
<b>Verification/Tests</b> <p>Interviewed national Maintenance Manager</p> <p>Examined letter from Authority approving Achieve It Consulting as the auditor.</p>	
<b>Observations</b> <p>Achieve It Consulting with the approval of the Authority has been appointed to undertake the performance audit. The audit Period is 1 February 2011 to 31 August 2012</p>	
<b>Compliance summary:</b> <p>Compliant</p>	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 17</b> Trading Licence Clause 5.1	Compliance rating Not Applicable
<i>Energy Coordination Act section 11ZK (3)</i> <p>A licensee must pay the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.</p>	

<b>Verification/Tests</b>
Interviewed National Maintenance Manager
<b>Observations</b>
As the retailer and distributor are the same company the distributor is responsible for the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.
<b>Compliance summary:</b>
Not Applicable
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 24</b>	Trading Licence Clause 20	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZQH</i>		
The requirement is that the Licensee must not supply gas to customers unless the Licensee is a member of an approved Gas Industry Ombudsman Scheme and is bound by any decision or direction of the ombudsman under the Scheme.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined payments ledger		
<b>Observations</b>		
The licensee is a member of Gas Industry Ombudsman Scheme and the payments ledger entries confirmed that the licensee has paid the required fees. During the audit period no decision or direction was provided by the ombudsman.		
<b>Compliance summary:.</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		



<b>Item 25</b>	Trading Licence Clauses 5.1	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11Z</i> The requirement is that a Licensee must comply with the standards of the <i>Gas Standards Act 1972</i> .		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined <i>Gas Standards Act 1972</i>		
<b>Observations</b> The majority of obligations under the <i>Gas Standards Act 1972</i> that apply in regard to supplying gas are the responsibility of the distributor and discussion with the licensee regarding the other obligations that apply to a retailer regarding gas fitting work and the supply of gas appliances indicated that if any of the activities occurred they would be undertaken in accordance with the Act. Discussion with EnergySafety confirmed that the gas quality has been in compliance with the regulatory requirements throughout the audit period.		
<b>Compliance summary:.</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

#### LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION (CUSTOMER CONTRACTS) REGULATIONS 2004

<b>Item 32</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 12.(2)</i> Except in prescribed circumstances, a licensee must not disconnect or cause disconnection to occur if —  (a) a customer has provided to the licensee a written statement from a medical practitioner to the effect that supply is necessary in order to protect the health of a person who lives at the customer's supply address; and  (b) the customer has entered into arrangements acceptable to the licensee in relation to payment for gas supplied.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader		
<b>Observations</b> The policy of the Licensee has been not to disconnect consumers. Examination of consumer records and accounts verified that disconnections have not occurred. However, recently a policy has been developed covering disconnections and in the first instance a letter is forwarded to the customer informing them that disconnection will occur for non- payment. This has been sufficient in each case to resolve the matter without taking a further step towards disconnection.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

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<b>Item 33</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts)Regulation 12.(4)(a)</i> Before disconnecting supply for non-payment of a bill, a licensee must give a written reminder notice to a customer not less than 14 business days after the day on which a bill was issued advising the customer that payment is overdue and requiring payment to be made on or before the day specified in the reminder notice (being a day not less than 20 business days after the billing day).	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader	
<b>Observations</b> The policy of the Licensee is not to disconnect consumers. However, the policy is changing and a procedure has been developed and implemented covering disconnection. In the first instance a disconnection and final notice is sent to the customer that satisfies and is in accordance with the above obligation. To date the notice has been sufficient for the non-payment to be resolved without the need for a disconnection to proceed any further.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 34</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts)Regulation 12.(4)(b)</i> Before disconnecting supply for non-payment of a bill, a licensee must give a disconnection warning to a customer not less than 22 business days after the billing day advising the customer that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given).	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Retail and Marketing Examined customer records	
<b>Observations</b> The policy of the Licensee is not to disconnect consumers. However, the policy is changing and a procedure has been developed and implemented covering disconnection. All customer bills are sent out the month before payment is due and customers have until the 21st of the following month to settle the bill. If after 10 days following the due date for payment a customer has not paid the bill or made alternative arrangements a reminder letter is sent to the customer. This is followed after a further 14 days by a Disconnection and Final Demand Notice. The notice gives the customer 10 days to pay the bill or arrange other payment options with the licensee otherwise the gas will be disconnected. This action has been sufficient to date for the matter to be resolved without the need to proceed to the next step of the disconnection	

process detailed in the licensee's procedure KHO-PD-CST-040-22.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

**Item 35** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12 (5)(a)*

A licensee must reconnect supply to a customer within 10 business days after disconnection for non-payment of a bill if the customer pays the overdue amount or makes an arrangement for its payment and the customer has paid any applicable reconnection fee.

**Verification/Tests**

Interviewed Customer Service Team Leader and Retail and Marketing Manager  
Examined consumer records and accounts

**Observations**

The policy of the Licensee has been not to disconnect consumers. Therefore reconnections have not occurred.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 36** Trading Licence Clause 5.1

Compliance Rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12.(5)(b)*

A licensee must reconnect supply to a customer within 10 business days after disconnection for denial of access to a meter, if the customer provides access to the meter and the customer has paid any applicable reconnection fee.

**Verification/Tests**

Interviewed Customer Service Team Leader and Retail and Marketing Manager

**Observations**

The policy of the Licensee has been not to disconnect consumers. Therefore reconnections have not occurred.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

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<b>Item 37</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12 (5)(c)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for unlawful consumption of gas, if the customer pays for the gas consumed and the customer has paid any applicable reconnection fee.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> The policy of the Licensee has been not to disconnect consumers. Therefore reconnections have not occurred. Examination of records found no evidence that reconnections had occurred.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b> None	

<b>Item 38</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(5)(d)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for refusal to pay a refundable advance, if the customer pays the refundable advance and the customer has paid any applicable reconnection fee.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> The policy of the Licensee has been not to disconnect consumers or require refundable advances. Examination of consumer records and accounts verified that disconnections and refundable advances have not occurred/requested..	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 39</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12.1.5(e)</i> A licensee must reconnect supply to a customer within 20 business days after disconnection in an emergency situation or for health, safety or maintenance reasons, if the situation or problem giving rise to the need for disconnection has been rectified, and if the customer has paid any applicable	

reconnection fee.
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Retail and Marketing Manager Examined consumer records and accounts
<b>Observations</b> No reconnections took place during the audit period as no disconnections occurred for an emergency situation or for health, safety or maintenance reasons
<b>Compliance summary</b> Not rated

<b>Item 40</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.1.2</i> A licensee must not disconnect supply to a customer who is unable to pay until: alternative payment options have been offered to the customer; the customer is given information on government funded concessions; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Retail and Marketing Manager Examined disconnection and final notice and policy document covering disconnection.	
<b>Observations</b> To date no disconnections have occurred because a customer is unable to pay. The disconnection and final notice has been sufficient to enable the matter to be resolved. However, the notice provides for the customer to contact the licensee to discuss alternative payment options.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 41</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.1.3</i> A licensee must not disconnect supply to a business customer until: it has used its best endeavours to contact the customer; it has offered the customer an extension of time to pay the bill; and it has provided the customer a written notice of its intention to disconnect at least 5 business days' notice prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Area Sales Representative Examined consumer records and accounts	
<b>Observations</b> The licensee has only one business customer and no disconnection occurred during the audit period	
<b>Compliance summary</b>	

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 42** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.2.1 & 5.1.2.2*

A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements; the customer is provided written advice on each occasion access was denied; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.

**Verification/Tests**

Interviewed Customer Service Team Leader and Retail and Marketing Manager

Examined consumer records and accounts

**Observations**

Policy of Licensee has been not to disconnect consumers. Examination of consumer records and accounts verified that disconnections did not occur during the audit period. The disconnection policy that has recently been implemented by the licensee addresses the above obligation

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 43** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.3.1 & 5.1.3.2*

A licensee who disconnects in the event of an emergency must provide a 24 hour information service, estimate the time when gas supply will be restored and use best endeavours to restore supply when the emergency is over.

**Verification/Tests**

Interviewed National Maintenance Manager

Examined records

**Observations**

No disconnections for emergency events occurred in the audit period.

If such an event occurred as the trader and distributor are the same company it would be the responsibility of the distributor to disconnect the customer. The licensee has a 24 hour customer information service.

**Compliance summary:**

Not rated

**Corrective Action/Opportunity for Improvement**

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<b>Item 44</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.4.1 &amp; 5.1.4.2</i> A licensee who disconnects supply for health and safety reasons must provide the customer written notice of the reason; allow the customer 5 business days to remove the reason where the customer is able to; and after the 5 business days issued a notice to the customer of its intention to disconnect supply at least 5 business days' notice prior to the disconnection date.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined consumer records and accounts	
<b>Observations</b> No disconnection for the above reasons occurred during the audit period	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 45</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.5.1 &amp; 5.1.5.2</i> A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice; and used best endeavours to minimise disruption and restore supply.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined consumer records and accounts	
<b>Observations</b> Disconnections of this type would be the responsibility of the distributor. No such disconnections occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 46</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.7.2</i> A licensee must not disconnect supply for failure by a customer to pay a refundable advance without giving a written notice to the customer of its intention to disconnect at least 5 business days prior to the disconnection date.	

<b>Verification/Tests</b>
Interviewed Customer Service Team Leader Examined consumer records and accounts
<b>Observations</b>
Licensee does require refundable advances and records confirmed no refundable advances exist.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 47</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(a)</i> A licensee must not disconnect supply where the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader Examined customer billing data base and accounts.		
<b>Observations</b>		
Examination of database and accounts verified that no disconnections occurred during the audit period.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 48</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(b)</i> A licensee must not disconnect supply where the issue is the subject of complaint by the customer and is being reviewed externally and is not resolved.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
<b>Observations</b>		
Examination of database and accounts verified that no disconnections occurred during the audit period.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		



<b>Item 49</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(c)</i> A licensee must not disconnect supply where an application for a government concession has not been decided.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined consumer records and accounts	
<b>Observations</b> Licensee does not offer government concessions and during the audit period has not disconnected any customers.. Examination of consumer records and accounts verified that no disconnections occurred and government concessions are not provided.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 50</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(d)</i> A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined consumer records and accounts	
<b>Observations</b> Examination of consumer records and accounts verified that no disconnections occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 51</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(e)&amp;(f)</i> A licensee must not disconnect supply after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined consumer records and accounts	

<b>Observations</b>
. Examination of consumer records and accounts verified that no disconnections occurred during the audit period. The disconnection policy that is being implemented by the Licensee ensures disconnections will not take place in contravention of the above obligation. .
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 52</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.2.2.2</i> If a licensee is under an obligation to reconnect supply and the customer makes a request for reconnection after 3pm on a business day, the licensee use best endeavours to reconnect the customer as soon as possible on the next business day.	
<b>Verification/Tests</b>	
Interviewed Customer Service Team Leader Examined consumer records and accounts	
<b>Observations</b>	
Examination of consumer records and accounts verified that no reconnections occurred during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 53</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 13(1) AGA Code Clause 4.4.6.2</i> If a licensee uses a refundable advance to offset an amount owed, it must provide to the customer an account of its use and pay any balance within 10 business days to the customer.	
<b>Verification/Tests</b>	
Interviewed Customer Service Team Leader  Interviewed Team Leader Credit– Funds Management & Reticulation  Examined records and customer accounts	
<b>Observations</b>	
Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur.	
<b>Compliance summary</b>	
Not rated	

**Corrective Action/Opportunity for Improvement**

<b>Item 54</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 13(3)</i> A licensee must place refundable advances in separate trust accounts and separately identify the amounts in its accounting records.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader  Interviewed Team Leader Credit– Funds Management & Reticulation  Examined records and customer accounts		
<b>Observations</b> Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 55</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 13(4)</i> A licensee must return interest earned on refundable advances accounts to customers.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader  Interviewed Team Leader Credit– Funds Management & Reticulation  Examined records and customer accounts		
<b>Observations</b> Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 56</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts)Regulation 14(2)</i> A licensee must inform customers that the supply charge is either for residential or non -residential supply; includes a specified fixed component and specified usage component; and describes the circumstances a customer needs to meet to qualify for residential tariffs.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader and Team Leader Credit– Funds Management & Reticulation  Examined welcome letter		
<b>Observations</b>  The small use gas supply agreement terms and conditions contains an explanation on the supply charge and only relates to residential customers. The welcome letter sent out customers also contains information on the supply charge  The contract for the non-residential customer sets out the gas cost and the meter rental charge and as such does not contain a supply charge.		
<b>Compliance summary:</b>  Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 57</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts)Regulation 14(3) AGA Code Clause 4.1.2.1 &amp; 4.1.2.2</i> A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader and Team Leader Credit– Funds Management & Reticulation  Examined records and customer accounts		
<b>Observations</b>  No request was received from a customer during the audit period for information on the tariff charged. However all new customers are provided information on the tariff.		
<b>Compliance summary:</b>  Compliant-5		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 58</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 14 AGA Code Clause 4.1.3.1 &amp; 4.1.3.2</i>		

A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit– Funds Management & Reticulation

**Observations**

No change occurred to the tariff during the audit period. However, as a change is going to occur in the near future, a process has been put in place to comply with this obligation.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

Process to be put in place to give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.

<b>Item 59</b> Trading Licence Clause 5.1	Compliance rating Complaint - 5
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*Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.1*

A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit– Funds Management & Reticulation

Examined billing process and accounts

**Observations**

Bill sent every two months to residential customers and every month to business customers.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

<b>Item 60</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
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*Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3*

A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation

Examined a cross section of customer bills dating from February 2011 to August 2012.
<b>Observations</b> <p>The bill format and information contained in the bill has been changed during the audit period and now contains all the information required in the AGA code.</p>
<b>Compliance summary</b> <p>Compliant</p>
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 61</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.3.2</i> <p>A licensee must apply payments received from a customer as directed by the customers (if the bill includes charges for other goods and services).</p>	
<b>Verification/Tests</b> <p>Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management &amp; Reticulation</p> <p>Examined a number of customer bills</p>	
<b>Observations</b> <p>The Licensee does not include any goods or services charges on the bill.</p>	
<b>Compliance summary</b> <p>Not applicable</p>	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 62</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts) Regulation 15(1) &amp; 15(2)</i> <p>If a customer does not direct how a payment is to be allocated, a licensee must apply the payment —</p> <p>(i) to charges for the supply of gas before applying any portion of it to such goods or services; or</p> <p>(ii) if such goods or services include electricity, to the charges for gas and the charges for electricity in equal proportion before applying any portion of it to any other such goods or services.</p>	
<b>Verification/Tests</b> <p>Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management &amp; Reticulation</p> <p>Examined customer bills.</p>	
<b>Observations</b> <p>As no charges for goods and services occur all payments are allocated to the charges associated with supplying the gas.</p>	
<b>Compliance summary</b>	

Not applicable
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 63</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 15(1), 47(2) &amp; (4) AGA Code Clause 4.2.3.4</i> A licensee must provide available bill data to customers upon request free of charge subject to clause 47 (2) and (4) of the Energy Coordination (Customer Contracts) Regulations 2004.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation Examined customer database	
<b>Observations</b> No request for bill data has been received during the audit period. Should the licensee be requested to provide the above data the licensee confirmed it would be made available free of charge. The examination of the database confirmed the data is available.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 64</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.4.1</i> A licensee must base a customer's bill on a meter reading and meters must be read at least once per year.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation Examined bills and customer database.	
<b>Observations</b> Licensee reads the meter once every two months and the bill is based on meter readings.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 65</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.2</i>		
A licensee, who accepts a customer reading of the meter, must not adjust the bill in favour of the licensee if the licensee subsequently discovers the reading was incorrect in favour of the customer.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b>		
During the audit period no reading of the meter by the customer occurred. However, the licensee would ensure the above obligation was complied with it such a situation occurred.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 66</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.4</i>		
A licensee, who provides a customer with an estimated bill and is subsequently able to read the meter, must adjust the estimated bill in accordance with the meter reading.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
Examined customer bills		
Examined database		
<b>Observations</b>		
The licensee when it is able to read the meter adjusts the bill to the correct amount if the bill was previously estimated.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 67</b>	Trading Licence Clause 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Trading</i>		
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.5</i>		
A licensee must read a customer's meter upon request and may impose a fee for doing so.		
<b>Verification/Tests</b>		



Interviewed Customer Service Team Leader
<b>Observations</b> No customer requests for a meter read occurred during the audit period. However should a request be received the reading would be carried out at no charge.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

Item 68 Trading Licence Clause 5.1	Compliance rating Compliant-5
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.3.2.1</i> A licensee must offer payment in person and payment by mail.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation Examined bill	
<b>Observations</b> The Bill clearly states the payment options available which include payment in person and payment by mail	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

Item 69 Trading Licence Clause 5.1	Compliance rating Not rated
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.3.2.2</i> A licensee must offer customers who are absent for a long period, payment in advance facilities and the option of redirecting the bill.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b> No request for payment in advance and redirection of the bill was received during the audit period. However, processes exist for the licensee to offer the above options if requested by a customer.	
<b>Compliance summary</b> Not rated	

**Corrective Action/Opportunity for Improvement**

<b>Item 70</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 16(3)</i> A licensee must not terminate a contract if a customer commits a breach of the contract (other than a substantial breach) unless — (a) the licensee has a right to disconnect supply under the contract, a written law or a relevant code; and (b) the licensee has disconnected supply at all supply addresses of the customer covered by the contract.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b> No contracts were terminated during the audit period. The policy of the licensee is not to terminate contracts in any circumstance.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b> Consideration to be given to documenting this policy.		

<b>Item 71</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 19</i> A licensee must provide a customer (a) a copy of their customer service charter; (b) copies of regulations or any relevant code; (c) information about fees and charges payable under the contract; (d) with information on energy efficiency; (e) billing data; and (f) with information on Government Assistance Programs and Financial Counselling Services if requested by the customer.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b> No requests occurred for the above information during the audit period. However, the above		

information is readily available from the licensee and would be provided if requested by a customer.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 72** Trading Licence Clause 5.1

Compliance rating  
Compliant-5

**Licence:** *Trading*

*Energy Coordination (Customer Contracts)Regulation 20(2) AGA Code Clause 4.3.5.1*

A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation

Examined customer database

**Observations**

Licensee provides a number of options including those required under regulation 20(2) and works with the customer to assist them in managing payment of their account. Record of action taken contained in customer database in the diary notes section. The action taken is left to the discretion of the Team Leader Credit – Funds Management & Reticulation after discussion with the customer and when possible in line with their wishes. The hardship policy provides information on the action that can be taken.

At the time of the audit 26 customers were subject to an instalment plan. However, none had their bill redirected to a third person or had requested information or referral to government assistance programs; or requested information on independent financial counselling services.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

**Item 73** Trading Licence Clause 5.1

Compliance rating  
Compliant -4

*Energy Coordination (Customer Contracts)Regulation 27(4) & 40(3)*

A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

The licensee does not engage in door to door marketing. The initial approach is always from a builder or person who wants to use gas from the reticulation system.

The small use contract terms and conditions provide for the contract to be cancelled during a 10 day cooling off period.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

Consideration be given to including reference to a cooling off period in the welcome letter.

**Item 74** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts) Regulation 20(3) & 48*

A licensee must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.

**Verification/Tests**

Interviewed Team Leader Credit – Funds Management & Reticulation

**Observations**

No legal action occurred during the audit period. The policy of the licensee is not to take legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 75** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts) Regulation 22 & 49(2)*

A licensee must only provide a credit reporting agency with default information relevant to one of their bills.

**Verification/Tests**

Interviewed Team Leader Credit – Funds Management & Reticulation

**Observations**

No information was provided to a credit reporting agency during the audit period. However, the licensee has processes in place to provide a credit reporting agency with default information relevant to one of their bills if required.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

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<b>Item 76</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(3)</i>		
A licensee must notify a credit reporting agency immediately if a customer has cleared their debt.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b>		
The licensee did not notify a credit reporting agency that a customer had cleared their debt during the audit period as no instances of this type occurred. However, the licensee has a process in place to notify a credit reporting agency immediately if a customer has cleared their debt.		
<b>Compliance summary</b>		
Not rated.		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 77</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(4)</i>		
If a customer remedies a default and demonstrates extenuating circumstances, a licensee must request the credit reporting agency to remove the default record.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b>		
The licensee did not make any requests to a credit reporting agency during the audit period to remove a customer's default record as no instances of this type occurred. However, the licensee has a process if a customer remedies a default and demonstrates extenuating circumstances, to request the credit reporting agency to remove the default record.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 78</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(5)</i>		
A licensee must not refer a default to a credit reporting agency that is the subject of a complaint or matter of review.		

<b>Verification/Tests</b>
Interviewed Team Leader Credit – Funds Management & Reticulation
<b>Observations</b>
No information was provided to a credit reporting agency during the audit period. However, the licensee has a process for not referring a default to a credit reporting agency that is the subject of a complaint or matter of review.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 79</b>	Trading Licence Clause 5.1	Compliance rating Compliant-4
<i>Energy Coordination (Customer Contracts)Regulation 50</i>		
A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation		
<b>Observations</b> The disconnection and final notice provides information on the energy ombudsman and contains a comment to contact the licensee if they have a complaint.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		
The notice should be amended to make reference to the complaints handling process.		

<b>Item 80</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 44</i>		
When a non-standard contract is due to expire a licensee must issue a notice in writing to a customer between 1 and 2 months prior to the expiry date (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined non-standard contract for the only business customer.		
<b>Observations</b>		
Not able to rate this obligation as the only non- standard contract did not expire during the audit period. However, the previous audit found that the process was not being followed and the licensee has now implemented a process that will ensure the obligation is satisfied.		

<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 81</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts)Regulation 45(1)</i> Upon request, a licensee must provide a customer free of charge with a copy of its customer service charter within 2 business days of the request.	
<b>Verification/Tests</b> Interviewed the National Maintenance Manager Examined customer charter on website.	
<b>Observations</b> The charter is available on the website and if requested the licensee would refer the customer to the website. In instances where the customer does not have access to the website the licensee would mail a copy of the charter. Although this process would be followed no requests occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 82</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts)Regulation 45(2)</i> A licensee must from time to time provide the customer with advice with their bill that a customer service charter is available free of charge.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined a number of bills	
<b>Observations</b> The changes to the bill include a reference that a customer service charter is available free of charge.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 83</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 46(1)&amp; (2)</i> Upon request, a licensee must provide a customer with a copy of the <i>Gas Industry (Customer Contract) Regulations 2004</i> or a relevant code.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager		
<b>Observations</b> No request for a copy of the <i>Gas Industry (Customer Contract) Regulations 2004</i> or a relevant code was received during the audit period. However, the licensee would provide a copy if requested.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 84</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 46(4)</i> A licensee must ensure that a copy of the <i>Energy Coordination (Customer Contract) Regulations 2004</i> or a relevant code is available for inspection at its offices at no charge.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined a copy of <i>Energy Coordination (Customer Contract) Regulations 2004</i> and other legislative documents and industry codes		
<b>Observations</b> Confirmed a copy of the <i>Energy Coordination (Customer Contract) Regulations 2004</i> or a relevant code is available for inspection at the licensee's offices at no charge.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 85</b>	Trading Licence clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contract) Regulation 28, clause 3.1.1(a) AGA Code</i> A standard form contract must include a provision that the retailer or distributor must provide, install and maintain equipment for the supply of gas up to the point of supply		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined small use gas supply agreement terms and conditions		



<b>Observations</b>
Small use gas supply agreement terms and conditions contains a provision that the distributor provides, installs and maintains equipment for the supply of gas up to the point of supply
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 86</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code</i>		
A standard form contract must include a provision that the retailer or distributor must provide, install and maintain metering and necessary equipment at the supply address.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined small use gas supply agreement terms and conditions		
<b>Observations</b>		
Small use gas supply agreement terms and conditions contains a provision that the distributor provides, installs and maintains metering and necessary equipment at the supply address.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 90</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 33(3) AGA Code 3.5.2.2</i>		
A licensee must ensure that any representatives seeking access to the supply address on its behalf wear, carry and show official identification.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined licensee's official identity card		
<b>Observations</b>		
Identity card issued to all employees that require access to customer's property shows holder is representative of the licensee.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 91</b>	Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 42</i> A licensee must notify a customer of any amendment to a non-standard contract.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager		
<b>Observations</b> Licensee has only one business customer subject to a non-standard contract and the contract was not renewed or amended during the audit period.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

## LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

<b>Item 96</b>	Trading Licence Clause 18.	Compliance rating Compliant-5
<b>Licence:</b> <i>Trading</i>		
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must comply and require its expert to comply with the <i>Authority's</i> standard guidelines dealing with the performance audit.		
<b>Verification/Tests</b> Auditor provided with a copy of the <i>Authority's</i> standard guidelines dealing with the performance audit.		
<b>Observations</b> The performance audit was carried out in compliance with the <i>Authority's</i> standard guidelines dealing with the performance audit.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 97</b>	Trading Licence Clause 18.4	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee's independent auditor must be approved by the Authority prior to the audit.		
<b>Verification/Tests</b> Examined letter from Authority confirming approval of auditor		
<b>Observations</b>		

Letter confirms that Authority approved the auditor
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 98</b> Trading Licence Clause 19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee may be subject to individual performance standards.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	
<b>Observations</b> No individual performance standards were imposed during the audit period. However, the audit period was reduced from 24 to 18 months.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 99</b> Trading Licence Clause 20	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined information provided to the customer	
<b>Observations</b> All notices are provided in writing.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 100</b> Trading Licence Clause 23.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting	

Standards.
<b>Verification/Tests</b> Examined Annual Report of Licensee
<b>Observations</b> Annual Report states that accounting records comply with the required standards
<b>Compliance summary</b> Compliant.
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 101</b> Trading Licence Clause 24	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must report to the <i>Authority</i> if the Licensee is under external administration or experiences a significant change in its corporate, financial or technical circumstances.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader	
<b>Observations</b> The Licensee has not been under external administration or experienced a significant change in its corporate, financial or technical circumstances during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 102</b> Trading Licence Clause 21.	Compliance rating Compliant-2
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must provide to the <i>Authority</i> any information that the <i>Authority</i> may require in connection with its functions under the <i>Energy Coordination Act 1994</i> in the time, manner and form specified by the <i>Authority</i> .	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined performance report and the annual performance report Examined records to establish when delivery of the reports occurred.	
<b>Observations</b> The licensee provided all information requested during the first year covered by the audit period within the required timeframe. This included the annual compliance report. However, in 2012 the licensee failed to provide the performance report by the required time. This is due in part to key staff (Reticulation Manager) leaving the organisation and eastern state based personnel having to cover	

the duties until a replacement can be appointed.
<b>Compliance summary</b> Non-compliant
<b>Corrective Action/Opportunity for Improvement</b> Licensee to amend the process it follows in ensuring the information for the report is available and the report is prepared and submitted in accordance with the prescribed timeline.

<b>Item 103</b> Trading Licence Clause	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must publish any information it is directed by the <i>Authority</i> to publish, within the timeframes specified.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined annual performance report	
<b>Observations</b> Licensee was not required by the Authority to publish any information during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 106</b> Trading Licence Clause 12.2	Compliance rating Compliant -5
<i>Energy Coordination Act section 11M</i> A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined records	
<b>Observations</b> The Authority formally requested the licensee to review their standard contract during the audit period and the licensee complied and submitted the contract for approval to the Authority.	
<b>Compliance summary</b> Compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 107</b> Trading Licence Clause 12.3	Compliance Rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee must comply with any direction given by the Authority in relation to the scope, process and methodology of the standard form contract review.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	
<b>Observations</b> The Authority formally requested the licensee to review their standard contract during the audit period and the licensee complied and submitted the contract for approval to the Authority.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
<b>Item 108</b> Trading Licence Clause 13.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must only amend the standard form contract in accordance with the Energy Coordination Act 1994 and Regulations.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined records	
<b>Observations</b> At the request of the Authority the standard form contract was reviewed and submitted to the Authority for approval and the Authority approved the contract.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 109</b> Trading Licence clause 15.1 and 15.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee must maintain supply to a customer if it supplies, or within the last 12 months supplied, gas to that customer's premises unless another supplier starts supplying the customer.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	

**Observations**

Licensee is the only retailer supplying gas from this reticulation system and as supply is maintained continuously disconnections are not carried out.

**Compliance summary**

As no disconnections have occurred and no other supplier exists licensee complies with this obligation

**Item 110** Trading Licence Schedule 3 Clause 1.5

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

The requirement is that a Licensee must provide the *Authority* within 3 business days of a request by the *Authority* with reasons for refusing to commence supply to a customer if requested by the *Authority*.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation

**Observations**

No requests of this nature occurred during the audit period. However, should the licensee receive a request by the Authority it would comply with the request in the required time frame.

**Compliance summary**

Not rated.

**Corrective Action/Opportunity for Improvement****Item 111** Trading Licence Schedule 3 Clause 1.7

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

The requirement is that a Licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions.

**Verification/Tests**

Interviewed Customer Service Team Leader and Team Leader Credit – Funds Management & Reticulation

Examined records

**Observations**

No directions of this nature occurred during the audit period. . However, should the licensee receive a direction from the Authority it would comply with the request in the required time frame.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item 112</b>	Trading Licence Schedule 3 Clause 2.1 to 2.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee must provide reasonable information relating to its activities under the licence as requested by the holder of a distribution licence to enable for the safe and efficient operation of the relevant distribution system, provided such disclosure does not prejudice the commercial interests of the licensee.		
<b>Verification/Tests</b> Interviewed Manager Reticulation		
<b>Observations</b> As the same company hold both licences information flows freely between the retailer and the distributor.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 113</b>	Trading Licence Schedule 3 Clause 3.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A Licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader		
<b>Observations</b> A change in the gas price is scheduled to occur in September 2012 and the Minister has been notified and agreed the change. The notification has occurred more than one month prior to the change being implemented.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

## LICENCE COMPLIANCE REQUIREMENTS – GAS MARKETING CODE OF CONDUCT

<b>Item 114</b>	Trading Licence Clauses 19.1	Compliance rating Compliant-3
<i>Energy Coordination Act section 11ZPP</i> The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.		



<b>Verification/Tests</b>
Interviewed the Customer Service team Leader
<b>Observations</b>
Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the training is still outstanding. Although awareness of the requirements of the code have increased for the licensee to fully comply with the code the training needs to be completed.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable.

<b>Item 115</b> Trading Licence clause 19.2	Compliance rating Compliant-3
<i>Energy Coordination Act section 11M and 11ZPP</i> A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .	
<b>Verification/Tests</b>	Interviewed the Customer Service team Leader
<b>Observations</b>	Following the last audit a circular was sent out by Customer service trainer to all members of the customer service team about the need to increase the awareness of the above code and it contained a couple of paragraphs on what the code was and what the customer service officers needed to know. It also stated that further training would be provided. It has not been possible to ascertain if the training occurred and the trainer responsible for the circular has left the company. Therefore the training is still outstanding. Although awareness of the requirements of the code have increased for the licensee to fully comply with the code the training needs to be completed.
<b>Compliance summary</b>	Compliant
<b>Corrective Action/Opportunity for Improvement</b>	The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable.

<b>Item 116</b> Trading Licence Clause 19.1	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A marketer must ensure that its marketing representatives comply with Part 2 of the Code of	

Conduct.
<b>Verification/Tests</b> Interviewed the Customer Service team Leader
<b>Observations</b> The licensee is in the most part complying with Part 2 of the code as part of their normal business processes. However, staff need to be trained to ensure they fully understand the code and how to comply.
<b>Compliance summary</b> Non-compliant
<b>Corrective Action/Opportunity for Improvement</b> The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the code were applicable.

<b>Item117</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> Examined process for connecting new customer to the reticulation system which has been amended since the last audit and satisfied that the above obligation is complied with.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 118</b> Trading Licence clause 19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> Examined process for connecting new customer to the reticulation system which has been amended	

since the last audit and satisfied that the above obligation is complied with.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

<b>Item 119</b>	TradingLicenceClause19	Compliance rating Compliant -5
<b>Licence:</b> <i>Trading</i>		
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)</i> Where a standard form contract is not entered into as a result of door to door marketing or for a non-standard contract initiated by telephone, a marketing representative must obtain and make a record of the customer's verifiable consent that the specified information has been given.		
<b>Verification/Tests</b> Interviewed the Customer Service team Leader		
<b>Observations</b> Examined process for connecting new customer to the reticulation system and satisfied that the above obligation is complied with and the relevant records maintained.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item120</b>	TradingLicenceClause19	Compliance rating Not applicable
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(3)</i> Where a standard form contract is entered into as a result of door to door marketing or for a non-standard contract (other than that initiated by the customer by telephone or electronic means), a marketing representative must obtain the customer's written acknowledgement that the specified information has been given.		
<b>Verification/Tests</b> Interviewed the Customer Service team Leader		
<b>Observations</b> Examination of the process followed by the licensee revealed only standard form contracts are offered to customers who wish to connect to the reticulation system and in all instances the approach is made either by a builder or the customer to the licensee therefore no door to door marketing is undertaken by the licensee. In all instances customers are provided with information about the supply of LPG but do not require the customer 's written acknowledgement.		
<b>Compliance summary</b> Not applicable		

**Corrective Action/Opportunity for Improvement**

<b>Item121</b> Trading Licence Clause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)</i> Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must offer to provide the customer with a copy of the contract and, where this offer is accepted by the customer, provide a copy of the contract at that time or as soon as possible thereafter.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined small use gas supply agreement terms and conditions	
<b>Observations</b> The welcome letter sent to a customer provides for the customer to obtain a copy the small use gas supply agreement terms and conditions. During the audit period no request was received from a customer for a copy of the contract. However, should a request be received for a copy it would be provided either electronically or by post that day.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item122</b> Trading Licence Clause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i> Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader Examined welcome pack and terms and conditions document.	
<b>Observations</b> The licensee provides the required information to the customer as part of the process of signing up a new account.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item123</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(3)</i> In circumstances where a standard form contract is not entered into as a result of door to door marketing, a retailer or marketing representative must give the specified information no later than with or on the customer's first bill and a copy of the contract if requested by the customer (and the customer has not previously received a copy).	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader Examined welcome pack and terms and conditions document.	
<b>Observations</b> The licensee provides the specified information to the customer in the welcome pack within the required time frame.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 124</b> TradingLicenceClause19	Compliance rating Not applicable
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(4)</i> In circumstances where a standard form contract is entered into as a result of door to door marketing or a non-standard contract, a retailer or marketing representative must give the specified information and a copy of the contract before the customer has entered into the contract and must obtain a written acknowledgement that the information has been given.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader Examined process for connecting/signing up new customers to the reticulation system.	
<b>Observations</b> All requests for connection to the reticulation system are made by a builder or a customer. The licensee does not make contact with the customer in an attempt to try and get them to connect to the reticulation system. Therefore the licensee does not engage in door to door marketing.	
<b>Compliance summary</b> Not applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 125</b> Trading Licence Clause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i> A marketing representative must not, when marketing, engage in conduct that is misleading,	

deceptive or likely to mislead or deceive or that is unconscionable.
<b>Verification/Tests</b> Interviewed the Customer Service team Leader
<b>Observations</b> The licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. Once an approach is made to the licensee the customer service representative complies with the above obligation.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item126</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)</i> A marketing representative must not exert undue pressure on a customer, nor harass or coerce a customer.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> The licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. Once an approach is made to the licensee the customer service representative complies with the above obligation.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item127</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(3)</i> A marketing representative must ensure that the inclusion of concessions is made clear to customers and any prices that exclude concessions are disclosed.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> No concessions are offered by the licensee.	
<b>Compliance summary</b> Not rated	

<b>Corrective Action/Opportunity for Improvement</b>
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<b>Item128</b> TradingLicenceClause19	Compliance rating Not applicable
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(4)</i> A marketing representative must ensure that all standard form contracts that are entered into as a result of door to door marketing and all non-standard contracts are in writing.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> The licensee does not market the reticulation system it is left to a builder or potential customer (property on line of main) to approach the licensee for a connection. The licensee only provides a copy of the contract if requested by the customer.	
<b>Compliance summary</b> Not applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item129</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(5)</i> A marketer must ensure that a customer is able to contact the marketer on the marketer's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> As part of the functions of the customer service team following contact being made by a potential customer information is provided to enable the potential customer or builder to contact the licensee for any matters relating to gas supply.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b> .	

<b>Item130</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(1)</i> A marketing representative must provide the information specified to the customer when marketing by means other than face to face and after having identified the purpose of the	

contact, if the contact is not by electronic means, the marketing representative must ask the customer whether they wish to proceed further.
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader
<b>Observations</b> The licensee complies with this requirement as part of dealing with a potential customer. As stated previously the initial contact is made by the builder or customer to the licensee.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item131</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(2)</i> A marketing representative must, on request, provide the customer with its and the retailer's complaints telephone number and marketing identification number.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader	
<b>Observations</b> If requested the licensee would provide this information via a customer service team member. However, during the audit period no request for such information was made.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b> Ensure training includes reference to this obligation	

<b>Item132</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(3)</i> A marketing representative who meets with a customer face to face must:  a) as soon as practicable tell the customer the purpose of the visit; b) wear a clearly visible and legible identity card showing the information specified; and c) as soon as practicable provide the information specified in writing to the customer.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> No marketing has been performed face to face in respect of the reticulation systems during the audit period. The practice of the licensee is not to meet the customer face to face to conduct any	



marketing activities.
<b>Compliance summary</b> Not rated.
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item133</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(4)</i> If, when marketing to a customer, the customer indicates that they wish to end the contact, the marketing representative must end the contact as soon as practicable and not attempt to contact the customer for the next 30 days unless the customer agrees otherwise.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> As the customer or builder contacts the licensee it is unlikely that such a situation would occur. However, should it occur the licensee would comply with the above obligation..	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b> Ensure training includes reference to this obligation	

<b>Item134</b> TradingLicenceClause19	Compliance rating Compliant -5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(5)</i> Unless requested by the customer, a marketing representative must not make contact with a customer outside the permitted call times, unless the contact is by electronic means or the contact arises outside the customer's premises in circumstances where the customer initiates contact.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> All contact outside the permitted call times has been by electronic means.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item135</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(6)</i>	

A marketing representative must ensure that contact for the purposes of marketing does not continue for more than 15 minutes past the end of the permitted call times without the customer's verifiable consent unless the contact is by electronic means.
<b>Verification/Tests</b> Interviewed the Customer Service team Leader
<b>Observations</b> All contact has been in accordance with the above requirements.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item136</b> TradingLicenceClause19	Compliance rating Compliant -5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(7) &amp; 2.6(8)</i> Except in response to a customer request or query, a marketer must keep the specified records each time it initiates contact with a customer for the purposes of marketing.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader	
<b>Observations</b> When discussing issues regarding a gas connection and setting up an account following an initial approach by a builder or potential customer (property on line of main), the required records are kept. This would satisfy this obligation if it is considered to be marketing.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item137</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(1)</i> Where the customer requests not to be contacted for the purposes of marketing a marketer must ensure that a customer is not contacted on its behalf in relation to the supply of gas for a period of two years unless: <ul style="list-style-type: none"> <li>○ the customer requests contact; or</li> <li>○ the customer has moved premises; or</li> <li>○ a marketer has a legal obligation to contact the customer.</li> </ul>	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	

<b>Observations</b>
The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. The licensee needs to make the customer service staff are aware of the need to comply with this obligation as part of the training if following contact from a customer the customer decides not to proceed with a gas supply from the reticulation system. However during the audit period no request of this type has been received by the licensee, should such a request be made the licensee it would comply with this obligation.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>
Ensure training includes reference to this obligation

<b>Item138</b>	Trading Licence Clause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(2)</i>		
A marketer must keep a record of each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request.		
<b>Verification/Tests</b>		
Interviewed the Customer Service team Leader		
<b>Observations</b>		
The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. The licensee needs to make the customer service staff are aware of the need to comply with this obligation as part of the training if following contact from a customer the customer decides not to proceed with a gas supply from the reticulation system. During the audit period no requests where received from customers not to be contacted		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		
Training should include reference to this obligation and the process to be followed to ensure compliance.		

<b>Item139</b>	TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(3)</i>		
A marketer must give a copy of the record to the Gas Ombudsman or the Authority on request.		
<b>Verification/Tests</b>		
Interviewed the Customer Service Team Leader		
<b>Observations</b>		
As it was not necessary to record any of this type of information during the audit period no copies where requested by the Gas Ombudsman or the Authority.		
<b>Compliance summary</b>		
Not rated.		

**Corrective Action/Opportunity for Improvement**

Training should include reference to this obligation and the process to be followed to ensure compliance.

<b>Item140</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(4)</i> A marketer must provide the customer on request with written confirmation that the customer will not be contacted for the next two years.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader	
<b>Observations</b> The above is not a practise of the licensee as all approaches are made unsolicited to the licensee by the customer. The licensee needs to make the customer service staff are aware of the need to comply with this obligation as part of the training. During the audit period no requests of this type where received from customers.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b> Training should include reference to this obligation and the process to be followed to ensure compliance.	

<b>Item 141</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(5)</i> A marketing representative must comply with a notice on or near the premises indicating that the customer does not wish to receive unsolicited mail or other marketing information.	
<b>Verification/Tests</b> Interviewed the Customer Service team Leader	
<b>Observations</b> No direct door to door marketing has been performed in respect of the reticulation systems during the audit period therefore this obligation has not occurred.	
<b>Compliance summary</b> Not rated.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 142</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.8</i> A retailer and a marketer must comply with the National Privacy Principles as set out in the Privacy Act 1998 in relation to information collected under Part 2 of the Code of Conduct.	

<b>Verification/Tests</b>
Interviewed the Customer Service team Leader
<b>Observations</b>
All employees' complete training in the requirements of the National Privacy Principles as set out in the Privacy Act 1998 in relation to information collected under Part 2 of the Code of Conduct and are required to comply with the requirements. Examination of records confirmed no complaints were received during the audit period in relation to breaches of the Privacy Act.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item143</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(1)</i> A marketer must keep a record of each complaint made by a customer or a person contacted for the purposes of marketing and, on request, gives all information relating to the complaint to the Gas Ombudsman.	
<b>Verification/Tests</b>	
Interviewed the Customer Service team Leader	
<b>Observations</b>	
As the licensee does not contact customers for the purpose of marketing this obligation does not apply. The customer or the builder contacts the licensee to request connection and if a connection is possible the licensee arranges the connection and the setting up of the gas account. However, should a customer complaint be received during or after contact with a customer service team representative the details would be recorded the appropriate action taken to resolve the issue and all the information provided to the Gas Ombudsman on request.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item144</b> Trading Licence Clause19	Compliance rating Compliant-4
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i> A marketer must keep a record or other information required by the Code to be kept for at least 2 years.	
<b>Verification/Tests</b>	
Interviewed the Customer Service Team Leader	
<b>Observations</b>	
The licensee is aware of the information it needs to keep under the code if it engages in marketing.	
<b>Compliance summary</b>	

Compliant
<b>Corrective Action/Opportunity for Improvement</b> Training to reinforce the information to be kept and for what period.

## LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

<b>Item145</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> If a retailer agrees to sell gas 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 relevant distributor.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	
<b>Observations</b> This happens automatically as the retailer and distributor are the same company.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item146</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must forward the customer's request for the connection to the relevant distributor in the timeframe specified unless the customer agrees otherwise.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	
<b>Observations</b> This happens automatically as the retailer and distributor are the same company. Therefore time frame is always achieved.	
<b>Compliance summary</b> Compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item147</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must issue a bill no more than once a month and at least once every three months unless	

the circumstances specified exist.
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills.
<b>Observations</b> Customers are issued a bill every two months and during the audit period no exceptions from this period frequency occurred.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item148</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer may only place a residential customer on a shortened billing cycle, without the customer's verifiable consent, in the circumstances specified.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined gas bills Examined billing data base.		
<b>Observations</b> No customer was placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item149</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the customer written notice of a decision to shorten the customer's billing cycle within 10 business days of making the decision.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base.		

<b>Observations</b>
No customer placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item150</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined bills		
Examined billing data base.		
<b>Observations</b>		
No customer placed on a shortened billing cycle during the audit period It is not the policy of the licensee to place customers on a shortened billing cycle.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item151</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(5)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must return a customer, who is subject to a shortened billing cycle and has paid three consecutive bills by the due date, on request, to the billing cycle that previously applied to the customer.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined bills		
Examined billing data base		
<b>Observations</b>		
No customer placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		



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<b>Item152</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(6)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>  A retailer must inform a customer, who is subject to a shortened billing cycle, at least once every three months, of the conditions upon which a customer can be returned to its previous billing cycle.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader  Examined bills  Examined billing data base		
<b>Observations</b>  No customer placed on a shortened billing cycle during the audit period It is not the policy of the licensee to place customers on a shortened billing cycle.		
<b>Compliance summary</b>  Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item153</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>  In respect of any 12 month period, on receipt of a request by a customer, a retailer may provide a customer with estimated bills under a bill smoothing arrangement.		
<b>Verification/Tests</b>  Interviewed Customer Service Team Leader  Examined bills  Examined billing data base		
<b>Observations</b>  During the audit period no customers where provided with estimated bills under a bill smoothing arrangement. It is not the policy of the licensee to provide a customer with estimated bills under a bill smoothing arrangement.		
<b>Compliance summary</b>  Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item154</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> If a retailer provides a customer with estimated bills under a bill smoothing arrangement the retailer must ensure that the conditions specified are met.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base		
<b>Observations</b> During the audit period no customers where provided with estimated bills under a bill smoothing arrangement. It is not the policy of the licensee to provide a customer with estimated bills under a bill smoothing arrangement.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item155</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.4	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> 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.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base		
<b>Observations</b> Examination of the billing data base confirmed that bills on the request of the customer have been send to another address or an electronic address.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item156</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must include minimum prescribed information on the customer's bill, unless the customer agrees otherwise.		

<b>Verification/Tests</b>
Interviewed Customer Service Team Leader Examined bills
<b>Observations</b>
Examination of bills sent at different times during the audit period has shown that following the amendments made in June 2012 the prescribed information items are now included in the bill.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item157</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A retailer must advise the customer of the amount of historical debt and its basis before, with or on the customer's next bill, if the retailer wishes to bill the customer for the historical debt.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit and Funds Management Examined bills Examined billing data base		
<b>Observations</b>		
Historical debt is set out on next bill.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item158</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A retailer must base the customer's bill on the distributor's or metering agent's reading of the meter, or the customer's reading of the meter in the circumstances specified.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team Leader Credit and Funds Management Examined bills Examined billing data base		

<b>Observations</b>
Examination of a number of bills showed that all bills are always in accordance with the above requirements.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item159</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A retailer must give the customer information that explains to that customer how to read a meter correctly (if applicable) in clear, simple and concise language.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined Licensee's website.		
<b>Observations</b>		
The Licensee's Customer Charter provides detailed information on how to read a gas meter. Information on reading the meter is also included in the Safety Awareness & Information for Customers using Reticulated Gas brochure provided in the welcome pack sent to all new customers.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item160</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.7	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A retailer must use its best endeavours to ensure that metering reading data is obtained as frequently as is required to prepare its bills and, in any event, at least once every twelve months in accordance with clause 4.6(1)(a) of the Gas Customer Code.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined bills		
Examined billing data base		
<b>Observations</b>		
Licensee's policy is to read the meter every two months and the Licensee will undertake if necessary repeated visits to a dwelling to obtain a reading.		

<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item161</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(1)	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11M</i>		
A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined bills		
Examined billing data base		
<b>Observations</b>		
Estimated bills provided during the audit period but are not provided in the manner specified..		
<b>Compliance summary</b>		
Non-compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item162</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(2)	Compliance rating Non-compliant -1
<i>Energy Coordination Act section 11M</i>		
A retailer must specify the stated information in circumstances where the customer's bill is estimated.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
Examined bills		
<b>Observations</b>		
A copy of an estimated bill showed that the licensee does not comply with this obligation		
<b>Compliance summary</b>		
Non-compliant		
<b>Corrective Action/Opportunity for Improvement</b>		
The licensee to include on the bill the information required in clause 4.8(2) of the Gas Customer Code which is:		
To specify in a visible and legible manner that the bill is estimated and advise the customer that the		

licensee will tell on request the basis of the estimation; and the reason for the estimation.
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<b>Item163</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must tell a customer, on request, the basis and reason for the estimation.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base	
<b>Observations</b> The basis and reason for the estimation would be provided to the customer if requested.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item164</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.9	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> Where the 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.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base	
<b>Observations</b> Estimated bills provided during the audit period are corrected in subsequent bills when the meter is read by the licensee's representative..	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item165</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.10	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	

A retailer must replace an estimated bill with a bill based on an actual reading if the customer satisfies the requirements as specified.
<b>Verification/Tests</b> Interviewed Customer Service Team Leader Examined bills Examined billing data base
<b>Observations</b> The need to replace an estimated bill did not occur during the audit period. However if such a situation was to occur the licensee would follow the required process.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item166</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must request the distributor or metering agent to test the meter if a customer requests the meter to be tested and pays any reasonable charge of the retailer for testing the meter.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager		
<b>Observations</b> No requests for a meter to be tested were received from a customer during the audit period However, should a request be received the request will be forwarded to the distributor to enable the test to be carried out.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item167</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> 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.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader		

<b>Observations</b>
No requests for a meter to be tested were received from a customer during the audit period. The distributor does not charge for testing meters.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item168</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.12(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
If a retailer offers alternative tariffs, a retailer must change the customer to an alternate tariff within the period specified if the customer applies to receive an alternate tariff and demonstrates to the retailer that the Customer satisfies the conditions of eligibility.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
<b>Observations</b>		
No alternative tariffs are offered		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item169</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.13	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must give the customer written notice prior to changing the customer to an alternative tariff if the customer's gas use has changed and the customer is no longer eligible to continue to receive an existing, more beneficial tariff.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader		
<b>Observations</b>		
No alternative tariffs are offered		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		



<b>Item170</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer may recover any amounts undercharged to a customer as a result of a change in the customer's gas use for the period of up to 12 months prior to the date on which the retailer provided notice in the specified manner.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b> No amounts were undercharged during the audit period and as a customer's meter is read every two months, this situation would not occur.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item171</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must repay any amounts overcharged to a customer as a result of a change in the customer's gas use.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b> No amounts overcharged during the audit period and as a customer's meter is read every two months, this situation would not occur.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item172</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must use reasonable endeavours to arrange for a final bill if a customer requests the retailer to issue a final bill at the customer's supply address.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer billing database		
<b>Observations</b> Final bill issued on request from a customer and addressed to customer's supply address.		

<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item173</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must repay the customer any amount in credit at the time of account closure.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b>		
No occurrences of this type occurred during the audit period and are unlikely to occur as bills based on actual use-age in arrears.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item174</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.16	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must review the customer's bill on request by the customer, subject to the customer paying the lesser of the portion of the bill agreed to not be in dispute or an amount equal to the average of the customer's bill over the previous 12 months, and paying any future bills that are properly due.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation		
Examined customer billing database		
<b>Observations</b>		
No review of bills occurred during the audit period. Should such a request be received the licensee would carry out the review.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item175</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must follow the procedures specified if a review of a bill has been conducted and the retailer is satisfied that the bill is correct or incorrect (as applicable).		

<b>Verification/Tests</b>
Interviewed Team Leader Credit and Funds Management & Reticulation
<b>Observations</b>
No reviews of bills occurred during the audit period. If a review was carried out it would be in accordance with the requirements of the Gas Customer Code.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item176</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must inform the customer of the outcome of the review of a bill as soon as practicable, but, in any event, within 20 business days from the date of receipt of the request for review.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b>		
No reviews of bills occurred during the audit period. The customer would be informed of the outcome of a review within the required timeframe if a review was to occur.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item177</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.18(2)	Compliance Rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must recover an amount undercharged as a result of an act or omission by a retailer or distributor in the manner specified.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b>		
No amounts were undercharged during the audit period		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item178</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must use its best endeavours to inform the customer (including a customer who has vacated the supply address) of an overcharge, and repay or credit any amount overcharged as a result of an act or omission by a retailer or distributor, in the manner and period specified.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b> No overcharges occurred during the audit period. However, the licensee has a process in place to cover such an event.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item179</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b> No overcharges occurred during the audit period.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item180</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must use reasonable endeavours to credit the amount overcharged within 20 business days of the customer making the request, in circumstances where instructions as to payment are not received by the customer.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b> No overcharges occurred during the audit period		
<b>Compliance summary</b>		

Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item181</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
The due date on the bill must be at least 12 business days from the date of the bill, with the date of dispatch deemed to be the date of the bill, unless the retailer specifies a later date.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader.		
Examined customer bills		
<b>Observations</b>		
After examining a number of bills that were issued during the audit period, concluded that the due date on the bill is more than 12 business days from the date the bill was dispatched. An amendment to the bill in June 2012 now includes both the issue and due dates.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item182</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A retailer must as a minimum offer the specified payment methods to the customer.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader.		
Interviewed Retail and Marketing Manager.		
Examined bills		
<b>Observations</b>		
All the specified payment methods contained in the Gas Customer Code are included on the bill		
<b>Compliance summary</b>		
Compliant.		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item183</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must comply with the Electronic Funds Transfer Code of Conduct with respect to an electronic payment arrangement.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined Electronic Funds Transfer Form.		
<b>Observations</b> Electronic payments are in accordance with Electronic Funds Transfer Code of Conduct and information is maintained in a hard copy file which includes the completed form signed by the customer.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item184</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.3	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must, prior to commencing a direct debit, obtain the customer's verifiable consent and agree to the specified conditions for the direct debit.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined Electronic Funds Transfer Form and Customer records.		
<b>Observations</b> The Electronic Funds Transfer Form used by the licensee requires the customers signature and details on the direct debit. The form is easy to read and understand and in the opinion of the auditor passes the plain language test set out in the definition of verifiable consent in the Gas Customer Code. As part of establishing a direct debit the licensee follows a process that includes ensuring compliance with clause 5.3 of the Gas Customer Code.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item185</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must accept payment in advance from a customer on request, in the circumstances specified.		

<b>Verification/Tests</b>
Interviewed Team Leader Credit and Funds Management & Reticulation. Examined customer database
<b>Observations</b>
No payments in advance were received during the audit period. However, should such a request be received the licensee would accept the payment if the circumstances specified applied.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item186</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.5	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must, at no charge, offer a residential customer a redirection of the customer's bill to a third person, if requested by a customer who is unable to pay by a minimum payment method, due to illness or absence.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b>		
No requests of this type were received during the audit period. However, the licensee would redirect the bill if requested by the customer.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item187</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer a late payment fee in the circumstances specified.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation. Examined customer database		
<b>Observations</b>		
No late payment fees have been charged other than in accordance with the prescribed requirements.		
<b>Compliance summary</b>		

Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item188</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer an additional late payment fee in relation to the same bill within five business days from the date of receipt of the previous late payment fee notice.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database.		
<b>Observations</b> Only one late payment fee is charged and this is specified on next bill.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item189</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer more than three late payment fees in relation to the same bill.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> Only one late payment fee is charged and this shown on the next bill.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item190</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must retrospectively waive any late payment fee charged, pursuant to a residential		



customer's last bill, prior to an assessment of financial hardship being made.
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> No assessments of financial hardship where undertaken during the audit period. The licensee would waive any late payment fee prior to an assessment of financial hardship being made.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item191</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not require a customer who has vacated a supply address to pay for gas consumed at the customer's supply address in the circumstances specified.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> During the audit period customers have not paid for gas where the required notice has been given. The licensee has a process in place to deal with customers who vacate a supply address to ensure that a customer is not charged for gas they have not consumed.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item192</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must not require a customer who was evicted or otherwise required to vacate a supply address to pay for gas consumed at the customer's supply address in the circumstances specified.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> The licensee during the audit period has not received any advice that a customer has been evicted or		

otherwise required to vacate a supply address. Should such advice be received the licensee has a process in place to deal with this event.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item193</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(4)	Compliance rating Not rated
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*Energy Coordination Act section 11M*

A retailer must not require a previous customer to pay for gas consumed at the supply address in the circumstances specified. A previous retailer must not require the customer to pay for gas consumed at the supply address in the circumstance specified. A retailer must not require the customer to pay for gas consumed at a disconnected supply address in the circumstances specified.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database

**Observations**

During the audit period the licensee has not required a previous customer to pay for gas consumed at the supply address prior to the customer entering into a contract for gas supply. As the licensee's policy has been not to disconnect customers no supply addresses were disconnected as part of the process of an address having a change in gas customer.

As the licensee is the only retailer the obligation relating to a previous retailer does not apply.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item194</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(1)	Compliance rating Not rated
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*Energy Coordination Act section 11M*

A retailer must comply with the Conduct Principles set out in the guideline on debt collection issued by the Australian Competition and Consumer Commission.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database

**Observations**

No proceedings for recovery of debt occurred during the audit period. However the licensee does comply with the above principles.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

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<b>Item195</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must not commence proceedings for recovery of a debt in the circumstances specified.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database.		
<b>Observations</b> No proceedings for recovery of debt occurred during the audit period. The licensee complies with the above obligation.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item196</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must not recover or attempt to recover a debt relating to a supply address from a person other than the customer with whom the retailer has or had entered into a contract for the supply of gas to that supply address.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database.		
<b>Observations</b> No proceedings for recovery of debt occurred during the audit period.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item197</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.9	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> Where a retailer and residential customer have entered into a dual fuel contract, or separate contracts for the supply of electricity and gas, the retailer must apply a payment received from a residential customer for charges for the sale of electricity or sale and supply of gas in the		

circumstances specified.
<b>Verification/Tests</b>
<b>Observations</b> No dual contracts or separate contracts for the supply of electricity and gas exist.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item198</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within three business days from when the residential customer informs a retailer that the customer is experiencing payment problems.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> The assessment whether a residential customer is experiencing payment difficulties or financial hardship is done immediately the licensee is made aware by the customer that they are experiencing payment problems.  The assessment is made in accordance with the licensee's hardship policy.  During the audit period assessments have been carried out within the required timeframe and with the agreement of the customer resulted in 26 customers being put on payment plans.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item199</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to the information and advice specified when undertaking an assessment regarding payment difficulties or financial hardship.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> The licensee always accepts that the customer is experiencing difficulty and will work with the		

customer or the relevant organisation representing the customer to find a solution that is acceptable to both parties.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

**Item 200** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 6.1(3)

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

A retailer must advise a residential customer on request of the details of an assessment.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database

**Observations**

There have been no requests from a customer for details of an assessment. The licensee would if an assessment was carried out provide the customer details on request.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 201** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 6.2(1)

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

A retailer may not unreasonably deny a residential customer's request for a temporary suspension of actions in the circumstances specified.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database

**Observations**

There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. However, should such a situation occur the licensee would comply with the above requirements.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item 202</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must allow a temporary suspension of actions for a period of at least 15 days.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. The licensee would comply with the required time period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 203</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to a request by a residential customer in the manner specified to allow a relevant consumer representative organisation additional time to assess a residential customer's capacity to pay.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. However, should this situation occur the licensee would grant the additional time.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 204</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must offer the alternative payment arrangements, and advise the residential customers that additional assistance may be available, in circumstances where a residential customer is assessed as experiencing payment difficulties or financial hardship.	
<b>Verification/Tests</b>	

Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> Alternative payment arrangements are offered and customers are if appropriate referred to Centrelink and other organisations that may be able to assist the customer in managing the debt. The licensee will after discussion with the customer accept payment arrangements nominated by the customer.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 205</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must offer a residential customer who is experiencing payment difficulties or financial hardship at least the specified payment arrangements.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> The licensee offers the customer additional time to pay and fee free and interest free instalment plans		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 206</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must take into account and specify the stated information and take the specified actions when offering an instalment plan to a residential customer experiencing payment difficulties or financial hardship.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> The licensee when offering an instalment plan complies with all the requirements of the Gas Customer Code.		
<b>Compliance summary</b>		

Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 207</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to a request by a customer, or a relevant consumer representative organisation, for a reduction of the customer's fees, charges, or debt.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> No requests of this nature were received during the audit period.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 208</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its hardship policy referred to in clause 6.10(2)(d).		
<b>Verification/Tests</b> Interviewed National Maintenance Manager and Customer Service Team Leader		
<b>Observations</b> The licensee has a hardship policy that complies with clause 6.10(2)(d) of the Customer Code and refers to the policy when considering a request by a customer, or a relevant consumer representative organisation, for a reduction of the customer's fees, charges, or debt.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		



<b>Item 209</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.7	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to offering a customer an instalment plan or offering to revise an existing instalment plan, in circumstances where it is reasonably demonstrated to the retailer that the customer is unable to meet its previously elected payment arrangement.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> No customer requests were received by the licensee to offer an instalment plan or revise an existing instalment during the audit period. However, should such a request be received reasonable consideration would be given to the request by the licensee.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 210</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.8	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must advise the customer of the specified assistance information.		
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database		
<b>Observations</b> Customers are advised of the assistance available by the licensee once the licensee becomes aware that the customer is experiencing financial hardship. The bill includes a statement regarding contacting the licensee if they are experiencing difficulties.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 211</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer		

representative organisations.
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> No advance payments occurred during the audit period. Customers experiencing difficulty are provided with a plan to clear the debt. Licensee will accept a payment in advance as required by the code but to date no such payments have been offered by a residential customer to the licensee.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 212</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer may apply different minimum payment in advance amounts for residential customers experiencing payment difficulties or financial hardship and other customers.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> No advance payments occurred during the audit period. Customers experiencing difficulty are provided with a plan to clear the debt. Licensee will accept a payment in advance as required by the code but to date no such payments have been offered by a residential customer to the licensee.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 213</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	

Examined copy of the hardship policy
<b>Observations</b> Hardship policy has been implemented.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 214</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must ensure that the hardship policy complies with the specified criteria.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined copy of the hardship policy	
<b>Observations</b> Hardship policy has been implemented following the Authority assessing the policy for compliance with the specified criteria and the Authority publishing the results of the assessment .	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 215</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give residential customers, financial counsellors and relevant consumer representative organisations, details of the financial hardship policy, at no charge. The retailer must provide all residential customers experiencing financial hardship details of the hardship policy.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager	
<b>Observations</b> Details on the Hardship policy have been made available to residential customers, financial counsellors and relevant consumer representative organisations at no charge.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

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<b>Item 216</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(4)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the specified information related to the hardship policy.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined records		
<b>Observations</b> Record of specified information relating to the Hardship policy is available.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 217</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must, unless notified in writing by the Authority, review its hardship policy at least annually and submit the review to the Authority within 5 business days after it is completed.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager		
<b>Observations</b> The hardship policy was reviewed and submitted to the Authority within the required time frame.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 218</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager		

<b>Observations</b>
The policy has been reviewed and as part of the review the Authority's Financial Hardship Policy Guidelines were utilised.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 219</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.11	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager and Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b>		
No request for alternative payment arrangements from a business customer experiencing payment difficulties was received during the audit period. However, should such a request be received the licensee would consider the request.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 220</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.1	Compliance rating Compliant -5
<i>Energy Coordination Act section 11M</i>		
A retailer must give the customer a reminder notice, use its best endeavours to contact the customer and give the customer a disconnection warning, in the manner and timeframes specified, prior to arranging for disconnection of a customer's supply address for failure to pay a bill.		
<b>Verification/Tests</b>		
Interviewed Team Leader Credit and Funds Management & Reticulation		
<b>Observations</b>		
The licensee has implemented a policy to cover the disconnection of customers but to date other than issuing a letter warning that disconnection could occur, in the manner and timeframes specified did not proceed to disconnect any customers.		
<b>Compliance summary</b>		

Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 221</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.2	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>  A retailer must not arrange for disconnection of a customer's supply address for failure to pay a bill in the circumstances specified.	
<b>Verification/Tests</b>  Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>  The licensee did not disconnect any customer during the audit period.	
<b>Compliance summary</b>  Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 222</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.3	Compliance rating Not Applicable
<i>Energy Coordination Act section 11M</i>  In relation to dual fuel contracts or separate contracts for the supply of electricity and the supply of gas, a retailer must not arrange for disconnection of the residential customer's supply address for failure to pay a bill within 15 business days from arranging for disconnection of the residential customer's gas supply.	
<b>Verification/Tests</b>	
<b>Observations</b>  No dual fuel contracts or separate contracts for the supply of electricity and the supply of gas exist.	
<b>Compliance summary</b>  Not applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 223</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>  A retailer must not arrange for the disconnection of a customer's supply address for denying access to the meter unless the conditions specified are satisfied.	
<b>Verification/Tests</b>	

Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation
<b>Observations</b> The licensee did not disconnect any customer during the audit period
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 225</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.6	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> The licensee did not disconnect any customer during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 226</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must arrange for reconnection of the customer's supply address if the customer has remedied its breach, makes a request for reconnection, pays the retailer's reasonable charges (if any) or accepts an offer of an instalment plan for the retailer's reasonable charges.	
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> The licensee did not disconnect any customer therefore no reconnections occurred.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 227</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must forward the request for reconnection to the relevant distributor within the timeframe specified.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b> The licensee during the audit period did not disconnect any customers therefore no reconnections occurred.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 229</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b> No variation in tariffs took place during the audit period.  However, the licensee is intending to vary the tariff in the near future and is following the required process to ensure that notice of any variations in its tariffs to each of its customers affected by a variation, is provided within the timeframes specified		
<b>Compliance summary</b> Non-compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 230</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, reasonable information on the retailer's tariffs, including alternative tariffs (if any).		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		



<b>Observations</b>
No request for tariff information from customers occurred during the audit period. However, should a request be received the information would be provided.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 231</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must give a customer the information requested on tariffs in the manner and within the timeframes specified.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b>		
No request for tariff information from customers occurred during the audit period.. However, should a request be received the information would be provided in the required time frame.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 232</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must, on request, give a customer its billing data.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b>		
No request for billing data received from a customer during the audit period. If requested the billing data would be provided to a customer.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 233</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data at no charge in the circumstances specified.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b> No request for billing data received from a customer during the audit period. The data would be provided at no cost to the customer.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 234</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data within 10 business days of the receipt of the request or payment of the retailer's reasonable charge for providing the billing data.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b> No request for billing data received from a customer during the audit period. The licensee would comply with the required time frame.		
<b>Compliance summary</b> Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 235</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(4)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a customer's billing data for seven years.		
<b>Verification/Tests</b> Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation Examined customer database.		
<b>Observations</b> All billing data is kept indefinitely in a database and can be accessed readily		

<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 236</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.3	Compliance rating Not Applicable
<i>Energy Coordination Act section 11M</i>		
A retailer must give a customer on request, at no charge, the concession information specified.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader and Team leader Credit & Funds Management Reticulation		
<b>Observations</b>		
The Licensee does not provide any concessions.		
<b>Compliance summary</b>		
Not Applicable		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 237</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>		
A retailer must give a customer on request, at no charge, the general energy efficiency information specified.		
<b>Verification/Tests</b>		
Interviewed Customer Service Team Leader Examined the Licensee's website		
<b>Observations</b>		
No request for the general energy efficiency information received during the audit period. The information is available from the licensee.		
<b>Compliance summary</b>		
Not rated		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 238</b>	Trading Licence clause 2.1 and Schedule 2 Gas	Compliance rating
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Customer Code clause 10.5	Compliant-5
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must give information to the customer, or refer the customer to the relevant distributor for a response, if asked by a customer for information relating to the distribution of gas.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed National Maintenance Manager</p>	
<p><b>Observations</b></p> <p>As the retailer and the distributor are the same company, information of this type is readily provided to the customer.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item 239</b> Trading Licence clause 2.1 and Schedule 2 Gas</p> <p>Customer Code clause 10.5A</p>	<p>Compliance rating</p> <p>Compliant-5</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must lodge with the Authority a gas customer safety awareness program in the manner and timeframes specified.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Customer Service Team Leader</p>	
<p><b>Observations</b></p> <p>The customer awareness program has been previously lodged with the Authority.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item 241</b> Trading Licence clause 2.1 and Schedule 2 Gas</p> <p>Customer Code clause 10.9</p>	<p>Compliance rating</p> <p>Compliant-5</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer, distributor and marketer must, to the extent practicable, ensure that any written information that must be given to a customer under the Gas Customer Code is expressed in clear, simple, and concise language and is in a format that makes it easy to understand.</p>	

<b>Verification/Tests</b> Interviewed the Customer Service Team Leader Examined information provided on the website and to customers
<b>Observations</b> Information provided to a customer under the Gas Customer Code is in the auditor's opinion expressed in clear, simple, and concise language and is in a format that makes it easy to understand.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 242</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Gas Customer Code.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader Examined website	
<b>Observations</b> The information provided was sufficient for me to download a copy from the Licensee's website or the Authority's website and I was also informed that i could obtain a hard copy from the office of the Licensee.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 243</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make electronic copies of the Gas Customer Code available, at no charge, on their website.	

<b>Verification/Tests</b> Interviewed the Customer Service Team Leader Examined website.
<b>Observations</b> The Gas Customer code is available on the licensee's website.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 244</b> Trading Licence clause 2.1 and Schedule Gas Customer Code clause 10.10(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make a copy of the Gas Customer Code available for inspection, at no charge, at their offices.	
<b>Verification/Tests</b> Interviewed the Customer Service Team Leader	
<b>Observations</b> Copies available and requested copy of the Gas Customer Code whilst at the office of the Licensee and was able to view a hard copy. Informed that copies available at other branch offices.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 245</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor.	
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined customer charter on website and bill.	

<b>Observations</b>
All written information provided by the licensee contains information that assist the residential customer in interpreting information provided by the retailer or distributor. In addition the call centre will provide the customer with information on interpreting services.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 246</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>  A retailer and, where appropriate a distributor, must include the telephone number for their special information services and for independent multi-lingual services and the National Interpreter Symbol, with the words "Interpreter Services", on the documents specified.	
<b>Verification/Tests</b>  Examined bills, letters and information on the licensee's website	
<b>Observations</b>  The licensee provides the information on the documents specified.	
<b>Compliance summary</b>  Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 247</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>  A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	
<b>Verification/Tests</b>  Interviewed National Maintenance Manager  Examined complaints manual and records	
<b>Observations</b>  A Manual has been developed by the licensee on how to deal with complaints and resolve disputes and is available to all employees on the licensee's intranet.	

<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 248</b>	Trading Licence clause 2.1 and Schedule 2	Compliance rating Compliant-5
Gas Customer Code clause 12.1(2)		
<i>Energy Coordination Act section 11M</i>		
A retailer and distributor must develop, maintain and implement a complaints handling process that meets the specified requirements.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined complaints manual and records		
<b>Observations</b>		
A Manual has been developed by the licensee on how to deal with complaints and meets the code requirements.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 249</b>	Trading Licence clause 2.1 and Schedule 2	Compliance rating Compliant-5
Gas Customer Code clause 12.1(3)		
<i>Energy Coordination Act section 11M</i>		
A retailer or distributor must at least provide the specified advice to a customer when handling a complaint.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager		
Examined complaints manual and records		
<b>Observations</b>		
The Manual provides for all the specified advice required in the Gas Customer Code to be given to a customer who contacts the licensee with a complaint. Licensee's customer service and call centre staff are trained to provide the specified advice and discussions with call centre staff confirmed that correct advice is provided.		
<b>Compliance summary</b>		
Compliant.		
<b>Corrective Action/Opportunity for Improvement</b>		



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<b>Item 250</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must comply with any guideline developed by the Authority relating to distinguishing customer queries from customer complaints.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined complaints manual and records		
<b>Observations</b> The requirements contained in the guidelines issued by the Authority relating to distinguishing customer queries from customer complaints have been incorporated into the licensee's process for dealing with customer complaints.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 251</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer, distributor and marketer must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager and Customer Service Team Leader		
<b>Observations</b> Although no requests for the above information were received during the audit period the licensee has a brochure that sets out this information which would be provided to a customer on request.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 252</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer, distributor or marketer who receives a complaint that does not relate to its functions, must refer the complaint to the appropriate entity and inform the customer of the referral.		

<b>Verification/Tests</b>
Interviewed National Maintenance Manager Examined complaint manual and policy
<b>Observations</b>
No complaint received during the audit period that needed to be referred. A process exists for referring a complaint to the appropriate entity and informing the customer of the referral.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 253</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer, distributor or marketer must keep a record or other information as required to be kept by the Gas Customer Code for at least two years from the last date on which the information was recorded, unless expressly provided otherwise.	
<b>Verification/Tests</b>	
Interviewed National Maintenance Manager Examined records	
<b>Observations</b>	
All relevant information is retained.	
<b>Compliance summary</b>	
Complaint	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 254</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number and percentage of customers under the affordability and access indicators specified.	
<b>Verification/Tests</b>	
Interviewed National Maintenance Manager Examined database containing information on affordability and access indicators.	
<b>Observations</b>	
Records kept on required information even if the number is zero	
<b>Compliance summary</b>	
Compliant	

<b>Corrective Action/Opportunity for Improvement</b>
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<b>Item 255</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(1)	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the customer complaint indicators specified.		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined complaints database		
<b>Observations</b> Two complaints received during the audit period. Records kept even if number zero		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 256</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a copy of each complaint referred to in clause 13.3(1) (including complaints made directly to a marketer).		
<b>Verification/Tests</b> Interviewed National Maintenance Manager Examined complaints database and Performance Report		
<b>Observations</b> During the audit period 2 complaints were received that related to metering both were resolved within 5 days. The complaints were included in the annual performance report submitted to the Authority.		
<b>Compliance summary</b> Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 257</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.5	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the call centre performance indicators specified.		

<b>Verification/Tests</b>
Interviewed National Maintenance Manager Examined records kept by licensee for the call centre
<b>Observations</b>
Examination of call centre records confirmed required information is recorded and retained
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 258</b>	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.6	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number of residential and business accounts specified.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager Examined customer database		
<b>Observations</b>		
Examination of the customer database confirmed a record of all residential and business accounts for the reticulation systems are maintained		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 265</b>	Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and a distributor must prepare a report setting out the information required by Part 13 of the Gas Customer Code, in respect of each year ending on 30 June. The report must be published no later than the following 1 October.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager Examined annual performance report submitted by licensee		
<b>Observations</b>		
The 2011 report was prepared submitted and published in accordance with the required timeframe.		
<b>Compliance summary</b>		

Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 266</b>	Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>		
A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.		
<b>Verification/Tests</b>		
Interviewed National Maintenance Manager Examined annual performance report submitted by licensee		
<b>Observations</b>		
The report for 2011 was provided to the Minister within the required timeframe.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

## **APPENDIX 2 COMPLIANCE SUMMARY**

# LICENCE COMPLIANCE REQUIREMENTS ENERGY COORDINATION ACT 1994

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
1.	Energy Coordination Act section 11Q(1-2)	Distribution Licence clause 4.1 Trading Licence clause 4.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
2.	Energy Coordination Act section 11WG(1)	Trading Licence clause 12.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
3.	Energy Coordination Act section 11WG(2)	Trading Licence clause 13.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
4..	Energy Coordination Act section 11WK(1-2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
5.	Energy Coordination Act section 11WK(3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
6.	Energy Coordination Act section 11X(3)	Trading Licence clause 5.1, Distribution Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
10.	Energy Coordination Act section 11ZA(1)	Trading Licence clause 16.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
17.	Energy Coordination Act section 11ZK(3)	Trading Licence clause 5.1,	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
24.	Energy Coordination Act section 11ZQH	Distribution Licence clause 17, Trading Licence clause 18.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		



### LICENCE COMPLIANCE REQUIREMENTS – GAS STANDARDS ACT 1972

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
25.	Energy Coordination Act section 11Z	Trading Licence clause 5.1,	Major	Unlikely	High	Strong	2					<input checked="" type="checkbox"/>		

### LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION (CUSTOMER CONTRACTS) REGULATIONS 2004

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
32.	Energy Coordination (Customer Contracts) Reg 12 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
33.	Energy Coordination (Customer Contracts) Reg 12 (4)(a)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
34.	Energy Coordination (Customer Contracts) Reg 12 (4)(b)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
35.	Energy Coordination (Customer Contracts) Reg 12 (5)(a)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
36.	Energy Coordination (Customer Contracts) Reg 12 (5)(b)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
37.	Energy Coordination (Customer Contracts) Reg 12 (5)(c)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
38.	Energy Coordination (Customer Contracts) Reg 12 (5)(d)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
39.	Energy Coordination (Customer Contracts) Reg 12 (5)(e)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
40.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
41.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
42.	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
43.	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.3.1 & 5.1.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
44.	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
45.	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
46.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.7.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
47.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
48.	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(b) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
49.	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(c) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
50.	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(d) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
51.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and (f) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
52.	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
53.	Energy Coordination (Customer Contracts)Reg 13 (1), Clause 4.4.6.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
54.	Energy Coordination (Customer Contracts) Reg 13 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
55.	Energy Coordination (Customer Contracts) Reg 13 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
56.	Energy Coordination (Customer Contracts) Reg 14 (2),	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
57.	Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
58.	Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>



November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
59.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
60.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 AGA Code	Trading Licence clause 5.1	Major	Unlikely	High	Strong	2					<input checked="" type="checkbox"/>		
61.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
62.	Energy Coordination (Customer Contracts) Reg 15 (1) and (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
63.	Energy Coordination (Customer Contracts) Reg 15 (1) and 47 (2) and (4), Clause 4.2.3.4 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
64.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
65.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
66.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
67.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
68.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
69.	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
70.	Energy Coordination (Customer Contracts) Reg 16 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
71.	Energy Coordination (Customer Contracts) Reg 19	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
72.	Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
73.	Energy Coordination (Customer Contracts) Reg 27 (4) and 40 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5				<input checked="" type="checkbox"/>			
74.	Energy Coordination (Customer Contracts) Reg 20 (3) and 48	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
75.	Energy Coordination (Customer Contracts) Reg 22 and 49 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
76.	Energy Coordination (Customer Contracts) Reg 49 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
77.	Energy Coordination (Customer Contracts) Reg 49 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
78.	Energy Coordination (Customer Contracts) Reg 49 (5)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
79.	Energy Coordination (Customer Contracts) Reg 50	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5				<input checked="" type="checkbox"/>			
80.	Energy Coordination (Customer Contracts) Reg 44	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
81.	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
82.	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
83.	Energy Coordination (Customer Contracts) Reg 46 (1) & (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
84.	Energy Coordination (Customer Contracts) Reg 46 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
85.	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
86.	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
90.	Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code	Trading Licence clause 5.1,	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
91.	Energy Coordination (Customer Contract) Reg 42	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>



## LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
96.	Energy Coordination Act section 11M	Trading Licence clause 16.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
97.	Energy Coordination Act section 11M	Trading Licence clause 16.4	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
98.	Energy Coordination Act section 11M	Trading Licence clause 17	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
99.	Energy Coordination Act section 11M	Trading Licence clause 20	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
100.	Energy Coordination Act section 11M	Distribution Licence clause 19.1, Trading Licence clause 21.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
101.	Energy Coordination Act section 11M	Trading Licence clause 22.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
102.	Energy Coordination Act section 11M	, Trading Licence clause 23.1	Major	Unlikely	High	Strong	2		<input checked="" type="checkbox"/>					
103.	Energy Coordination Act section 11M	Trading Licence clause 24	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
106.	Energy Coordination Act section 11M	Trading Licence clause 12.2	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
107	Energy Coordination Act section 11M	Trading Licence clause 12.3	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
108.	Energy Coordination Act section 11M	Trading Licence clause 13.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
109.	Energy Coordination Act section 11M	Trading Licence clause 15.1 and 15.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
110.	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.5	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
111.	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.7	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
112.	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 2.1 to 2.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
113.	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 3.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

## LICENCE COMPLIANCE REQUIREMENTS – GAS MARKETING CODE OF CONDUCT

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
114.	Energy Coordination Act section 11ZPP	Trading Licence clause 19.1.	Moderate	Unlikely	Medium	Moderate	4			<input checked="" type="checkbox"/>				
115.	Energy Coordination Act sections 11ZPP and 11M	Trading Licence clause 19.2	Moderate	Unlikely	Medium	Moderate	4			<input checked="" type="checkbox"/>				
116.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.1	Trading Licence clause 19.1	Moderate	Unlikely	Medium	Moderate	4		<input checked="" type="checkbox"/>					
117.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
118.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
119.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
120.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
121.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
122.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
123.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
124.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4						<input checked="" type="checkbox"/>	
125.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
126.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
127.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
128.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
129.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		



November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
130.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
131.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
132.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
133.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
134.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
135.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(6)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
136.	Energy Coordination Act section 11ZPP Code of Conduct clauses 2.6(7) and 2.6(8)	Trading Licence clause 19	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
137.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
138.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
139.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
140.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
141.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
142.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.8	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
143.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.11(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
144.	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.11(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4				<input checked="" type="checkbox"/>			

## LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
145.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
146.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
147.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
148.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
149.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
150.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(4)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
151.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(5)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
152.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(6)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
153.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
154.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.3(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
155.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.4	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
156.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.5(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		



November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
157.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.5(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
158.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.6(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
159.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.6(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
160.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.7	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
161.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.8(1)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
162.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.8(2)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
163.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.8(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
164.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.9	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
165.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.10	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
166.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.11(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
167.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.11(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
168.	Energy Coordination Act section M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.12(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
169.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.13	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
170.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.14(1)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
171.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.14(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
172.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.15(1)	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
173.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.15(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
174.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.16	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
175.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.17(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
176.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.17(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
177.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.18(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
178.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.19(2) and 4.19(6)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
179.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.19(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
180.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 4.19(4)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
181.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
182.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.2(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
183.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.2(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
184.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.3	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
185.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
186.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.5	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
187.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.6(1)	Moderate	Unlikely	Medium	Moderate	4				<input checked="" type="checkbox"/>			



November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
188.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.6(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
189.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.6(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
190.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.6(4)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
191.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.7(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
192.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.7(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
193.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.7(4)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
194.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.8(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
195.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 5.8(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
196.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
197.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.9	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
198.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
199.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(2)	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
200.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
201.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
202.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
203.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(3)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
204.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
205.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Code of Conduct clause 6.4(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
206.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
207.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(1)	Minor	Moderate	Low	Moderate	5							<input checked="" type="checkbox"/>
208.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
209.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.7	Minor	Moderate	Low	Moderate	5							<input checked="" type="checkbox"/>
210.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.8	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
211.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
212.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(2)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
213.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
214.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
215.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
216.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(4)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
217.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
218.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
219.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.11	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
220.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
221.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 7.2	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
222.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 7.3	Moderate	Unlikely	Medium	Moderate	4						<input checked="" type="checkbox"/>	
223.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 7.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
225.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 7.6	Major	Unlikely	High	Strong	2							<input checked="" type="checkbox"/>



November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
226.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 8.1(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
227.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 8.1(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
229.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2  Gas Customer Code clause 10.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
230.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
231.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
232.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
233.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
234.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
235.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(4)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
236.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.3	Moderate	Unlikely	Medium	Moderate	4						<input checked="" type="checkbox"/>	
237.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
238.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
239.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5A	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
241.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.9	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
242.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
243.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
244.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
245.	Energy Coordination Act section	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

	11M	clause 10.11(1)												
<b>November 2010 manual Ref number</b>	<b>Obligations under</b>	<b>Licence conditions</b>	<b>Consequences</b>	<b>Likelihood</b>	<b>Inherent Risk</b>	<b>Adequacy of Existing Controls</b>	<b>Review Priority</b>	<b>Rating 1</b>	<b>Rating 2</b>	<b>Rating3</b>	<b>Rating 4</b>	<b>Rating 5</b>	<b>Rating Na</b>	<b>Rating Nr</b>
246.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
247.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
248.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
249.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
250.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
251.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
252.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
253.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
254.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
255.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2010 manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
256.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
257.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.5	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
258.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.6	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
265.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.15(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
266.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.15(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

