



WORLEYPARSONS ASSET
MANAGEMENT PTY LTD
GAS TRADING LICENCE GTL 11
PERFORMANCE AUDIT REPORT

Prepared by Achieve It Consulting

131 Ponte Vecchio Boulevard

Ellenbrook WA 6069

28 October 2013

Performance Audit Trading Licence GTL 11

The fieldwork on the performance audit of Gas Trading Licence GTL 11 for the audit period 1 September 2010 to 31 August 2013 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 GTL11 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 GTL11 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 6 non-compliances which are important but not significant. In addition 5 suggestions to improve future compliance were identified.

Yours sincerely

Geoff Wood

Achieve It Consulting

28 October 2013

Contents

| | |
|--|------------|
| 1.0 EXECUTIVE SUMMARY | 4 |
| 1.1 Business background..... | 4 |
| 1.2 Audit conclusion..... | 4 |
| 2.0 PERFORMANCE AUDIT SUMMARY..... | 6 |
| 3.0 LIMITATION OF SCOPE | 6 |
| 4.0 PERFORMANCE AUDIT | 6 |
| 4.1 Performance Audit Scope..... | 6 |
| 4.2 Performance Audit Objective | 7 |
| 4.3 Performance Audit Methodology..... | 7 |
| 5.0 AUDIT RESULTS AND RECOMMENDATIONS | 8 |
| 5.1 Summary of Significant Results | 9 |
| 5.2 Audit Evidence | 10 |
| 5.3 Recommendations from the Previous Audit | 11 |
| 5.4 Suggestions for Improvement from Previous Audit | 15 |
| 5.5 Compliance Elements Requiring Corrective Measures Current Audit..... | 16 |
| 5.6 Suggestions for Improvement current audit | 18 |
| 5.7 Post Audit Implementation Plan | 20 |
| 6.0 APPENDIX 1- PERFORMANCE AUDIT DETAILS | 21 |
| 6.1 Detailed Audit Findings | 21 |
| APPENDIX 2 COMPLIANCE SUMMARY | 104 |
| NOVEMBER 2010 GAS COMPLIANCE MANUAL OBLIGATIONS | 150 |

1.0 EXECUTIVE SUMMARY

WorleyParsons Asset Management Pty Ltd engaged Achieve It Consulting to undertake the Performance Audit as required by the Economic Regulation Authority (Authority) under the Trading Licence GTL11. 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 July 2013 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 August 2013.

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 September 2010 to 31 August 2013 and this report details the outcome of the audit.

1.1 Business background

WorleyParsons Asset Management Pty Ltd has a Gas Trading licence (GTL11) issued by the Authority under the provisions contained in the *Energy Coordination Act 1994*. Trading Licence GTL11 allows WorleyParsons Asset Management Pty Ltd to retail natural gas to customers supplied from the distribution system in Esperance.

1.2 Audit conclusion

The Performance Audit has been conducted in order to assess WorleyParsons Asset Management Pty Ltd's level of compliance with the conditions of its Trading Licence GTL11. 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 WorleyParsons Asset Management Pty Ltd has complied with its Trading licence during the audit period.

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

During the last 12 months of the audit period both Esperance staff members, the Esperance Business Support Officer and the Esperance Area Manager, were replaced. The Business Support Officer plays a key role in ensuring the licensee complies on a daily basis with the licence conditions. The duties of this position include liaison with customers on gas matters including providing information on how to obtain a gas supply, setting up an account, entering meter reading data, issuing of gas bills, sending warning and disconnection notices and liaising with customers experiencing hardship. The

majority of contact with customers is by phone and the Officer has considerable freedom in determining what action is taken and how a matter is resolved. The development of a manual covering the steps to be taken when dealing with customers on the above matters and a checklist to record the actions taken would improve the control environment and assist in ensuring compliance. Currently only minimal information on the action taken is recorded.

During the audit period 1 September 2010 to 31 August 2013, in my opinion the licensee has complied with its Trading Licence, and the obligations contained in the 2010/2013 Gas Compliance Reporting Manuals. There are 6 non-compliances which need to be rectified, one is rated at significantly non-compliant 1 and the other 5 are rated as non-compliant 2. In addition a further 5 obligations have been listed as requiring improvement: 1 as compliant 3 and 4 as compliant 4.

The non-compliance rated as 1 is item 155 that relates to the need to provide information to a customer on the gas bill if it is estimated. The licensee attaches a note with the estimated bill to inform the customer it is estimated but needs to include the required information on the bill rather than as an attached note.

The non-compliances rated as 2 are items 82, 147, 222, 239 and 250. Item 82 relates to the need to provide with the bill from time to time that a customer service charter is available free of charge. However, a recent change means that this requirement is no longer obligatory and only needs to be complied with if the licensee decides to inform customers that it has a charter. Item 147 relates to the need to provide information on the bill specifically the national interpreter symbol. Absence of items that need to be provided on the gas bill were highlighted during the previous audit and the licensee has still to modify the bill to include any outstanding items. The licensee has stated that it was unable to comply because of limitations with its billing software. However, steps are being taken by the licensee to address the non-compliance through acquisition and further development of a new software package. Item 222 concerns the need to reference the complaints handling process on disconnection notices currently the licensee does not include this reference. Item 239 concerns the need to provide general information on how a customer may arrange for an energy efficiency audit at the customer's supply address, and the typical running costs of major domestic appliances (including referring a customer to a relevant information source). The licensee provides a document to new customers on energy efficiency but this additional requirement that has been included in the Compendium needs to be included in the licensee's energy efficiency publication. Item 250 refers to the need to provide the National Interpreter Symbol on reminder notices and disconnection warnings. The licensee needs to modify both documents to include the symbol.

The five items that could be improved are 72, 79, 81, 181 and 204. Items 72 and 204 recommend that the process the licensee uses for assisting customers suffering hardship or payment difficulties be documented together with a checklist to record the action taken to assist with future audits. Item 79 recommends that a disconnection notice include a specific comment about the licensee's complaints handling process. Item 81 recommends the customer charter be updated as some of the information is not current. However this is no longer compulsory as the need to have a customer charter is now optional and only needs to be complied with if the licensee decides to inform customers that it has a charter. Item 181 recommends that the bill include the dispatch/issue date to ensure the 12 business day payment requirement is satisfied.

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

2.0 PERFORMANCE AUDIT SUMMARY

A comprehensive report of the audit findings as applicable to the Gas Compliance Reporting Manuals 2013 and 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.

3.0 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.

4.0 PERFORMANCE AUDIT

4.1 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 September 2010 to 31 August 2013. The time period over which this audit was conducted was 1 September 2013 to 20 November 2013.

A previous audit was conducted for the period 1 September 2007 to 31 August 2010 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 2013 and 2010 were used as the performance criteria for assessing compliance.

The following people were interviewed during the Performance Audit:

- Licensee
 - Lawrence Teo WPAM Business and Regulatory Manager

- Joanna Loffler WPAM Esperance Administrative Officer
- Neville Selby - WPAM Esperance Area Manager
- Alan Shackleton - WorleyParsons Financial Controller
- EnergySafety
 - Cornelius De Groot, Principal Engineer Gas Supply EnergySafety
 - David Robertson, Principal Engineer Gas Utilization EnergySafety

4.2 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

| Phase | Auditor | Hours | Relevant Auditing Standard |
|--|---------|-------|---|
| 1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan | G Wood | 50 | 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 | 45 | 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"> • The control environment • Information system • Compliance procedures • Compliance attitude | G Wood | 90 | AUS 502: Audit Evidence AUS 806: Performance Auditing |

4.3 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 2013 and the equivalent obligation contained in the 2010 Manual issued by the Authority as both manuals cover parts of the audit period. Obligations that are specific to the 2010 Gas Compliance Reporting Manual have also been included. By assessing the licensee's compliance with each of the obligations in the Manuals 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 the licence clause and legislative instrument together with tables that identify the risk assessment and audit priority. These tables have 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 tables form 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 September 2007 to 31 August 2010 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.

5.0 AUDIT RESULTS AND RECOMMENDATIONS

The results of the audit are summarised below.

2013 Compliance Manual Audit Elements

| Assessment | Audit Priority 1 | Audit priority 2 | Audit priority 4 | Audit priority 5 | Totals |
|-----------------|------------------|------------------|------------------|------------------|------------|
| Compliant 5 | 4 | 5 | 81 | 26 | 116 |
| Compliant 4 | 1 | 0 | 2 | 1 | 4 |
| Compliant 3 | 0 | 0 | 0 | 1 | 1 |
| Non-compliant 2 | 3 | 1 | 3 | 1 | 8 |

| | | | | | |
|-------------------------------|---|---|----|----|-----------|
| Significantly non-compliant 1 | 0 | 0 | 1 | 0 | 1 |
| Not Rated | 0 | 1 | 51 | 43 | 95 |
| Not Applicable | 0 | 0 | 9 | 5 | 14 |

Audit Elements Unique to 2010 Compliance Manual

| Assessment | Audit Priority 1 | Audit priority 2 | Audit priority 4 | Audit priority 5 | Totals |
|-------------------------------|------------------|------------------|------------------|------------------|-----------|
| Compliant 5 | 0 | 0 | 9 | 1 | 10 |
| Compliant 4 | 0 | 0 | 0 | 0 | 0 |
| Compliant 3 | 0 | 0 | 0 | 0 | 0 |
| Non-compliant 2 | 0 | 0 | 0 | 0 | 0 |
| Significantly non-compliant 1 | 0 | 0 | 0 | 0 | 0 |
| Not Rated | | 0 | 10 | 1 | 11 |
| Not Applicable | 1 | 0 | 2 | | 3 |

5.1 Summary of Significant Results

The audit disclosed 6 non-compliances which need to be rectified, one rated as significantly non-compliant 1 and the other 5 rated as non-compliant 2. In addition a further 5 obligations have been listed as requiring improvement. One as compliant 3 and 4 as compliant 4.

The non-compliance rated as 1 is item 155 that relates to the need to provide information to a customer on the gas bill if it is estimated. The licensee attaches a note with the estimated bill to inform the customer it is estimated but needs to include the required information on the bill rather than as an attached note.

The non-compliances rated as 2 are items 82, 147, 222, 239 and 250. Item 82 relates to the need to provide with the bill from time to time that a customer service charter is available free of charge. However, a recent change means that this requirement is no longer obligatory and only needs to be complied with if the licensee decides to inform customers that it has a charter. Item 147 relates to the need to provide information on

the bill specifically the national interpreter symbol. .Absence of items that need to be provided on the gas bill were highlighted during the previous audit and the licensee has still to modify the bill to include any outstanding items. The licensee has stated that it was unable to comply because of limitations with its billing software. However, steps are being taken by the licensee to address the non-compliance through acquisition and further development of a new software package ProjectSight. Item 222 concerns the need to reference the complaints handling process on disconnection notices currently the licensee does not include this reference. Item 239 concerns the need to provide general information on how a customer may arrange for an energy efficiency audit at the customer's supply address, and the typical running costs of major domestic appliances (including referring a customer to a relevant information source). The licensee provides a document to new customers on energy efficiency but this additional requirement that has been included in the Compendium needs to be included in the licensee's energy efficiency publication. Item 250 refers to the need to provide the National Interpreter Symbol on reminder notices and disconnection warnings. The licensee needs to modify both documents to include the symbol.

The five items that could be improved are 72, 79, 81, 181 and 204. Items 72 and 204 recommend that the process the licensee uses for assisting customers suffering hardship or payment difficulties be documented together with a checklist to record the action taken to assist with future audits. Item 79 recommends that a disconnection notice include a specific comment about the licensee's complaints handling process. Item 81 recommends the customer charter be updated as some of the information is not current. However this is no longer compulsory as the need to have a customer charter is now optional and only needs to be complied with if the licensee decides to inform customers that it has a charter. Item 181 recommends that the bill include the dispatch/issue date to ensure the 12 business day payment requirement is satisfied.

5.2 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 and Compendium
 - Gas Marketing Code of Conduct
 - Gas Trading Licence GTL10
2. Licensee's documents
 - Prospective customers information package
 - Customer safety awareness program
 - Customer service charter
 - Small Use Gas Supply Agreement Terms and Conditions
 - Complaints Handling Policy
 - Annual information returns
 - Customer Bills
 - Hardship Policy
 - Disconnection Procedure

- Disconnection Letter and
- Final Disconnection Notice
- Energy Efficiency Information Document
- How to pay Your Gas Account Leaflet
- Various financial reports

5.3 Recommendations from the Previous Audit

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| Item (58) 58 Trading Licence Clause 5.1 | Compliance Rating Non-Compliant – 2 |
| <i>Energy Coordination (Customer Contracts) Regulation 14 AGA Code Clause 4.1.3.1 & 4.1.3.2</i> <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.</i> | |
| Corrective Action recommended from previous audit Licensee to develop scheduled process to insert notice in bill prior to tariff increase of tariff changes. | |
| Action taken since last audit An examination of a sample of bills shows that the licensee only increases the tariff by CPI. Each bill has a statement that alerts the customer to this fact. A further note is added to the bill immediately prior to the tariff changing informing the customer that the charges have changed in line with CPI. | |
| Recommendation | |
| Current status Compliant | |

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| Item (60) 60 Trading Licence Clause 5.1 | Compliance Rating Non-Compliant – 2 |
| <i>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</i> <i>A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.</i> | |
| Corrective Action recommended from previous audit Request exemption of explicit compliance with requirement and allow complying with industry standard or if required amend bill format to include required information required by the AGA Gas Customer Code by including a reference to meter testing in standard terms and condition | |
| Action taken since last audit The AGA code calls for inclusion on the bill a reference to meter testing. The licensee has during the audit period included this reference on the bill. | |
| Recommendation . | |
| Current status Compliant | |

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| Item (79) 79 Trading Licence Clause 5.1 | Compliance rating Non-compliant-2 |
| <i>Energy Coordination (Customer Contracts) Regulation 50</i> <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.</i> | |
| Corrective Action recommended from previous audit Add the required information to the disconnection warnings template. | |
| Action taken since last audit | |
| Current status Compliant | |

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| Item (82) 82 Trading Licence Clause 5.1 | Compliance Rating Non-Compliant – 2 |
| <p><i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(2)</i> <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.</i></p> | |
| <p>Corrective Action recommended from previous audit None as the regulation is due to be repealed.</p> | |
| <p>Action taken since last audit During the audit period the licensee has not included advice with the bill that a copy of the service charter is available free of charge. The requirement is to provide the information from time to time. Therefore it could be reasonably expected that this information should be provided at least once during the audit period. Recently the need to have a customer service charter was removed from the licence and the following advice on the issue was provided by the Authority. <i>"The Secretariat has sought legal advice regarding gas trading licences and customer service charter. The result is that gas trading licensees are no longer required to provide a charter, because this obligation has been removed from the licence. As a consequence, the parts of the Energy Coordination (Customer Contracts) Regulations 2004 that refer to customer service charter, now only apply in situations where the licensee wishes to provide a charter to customers voluntarily."</i> Therefore in the future the need for a licensee to provide a customer service charter is voluntary.</p> | |
| <p>Recommendation Licensee to include this information on or with the bill from time to time.</p> | |
| <p>Current status Non-compliant</p> | |

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| Item (102) 102 Trading Licence Clause 23.1 | Compliance Rating Non-Compliant – 2 |
| <p><i>Energy Coordination Act section 11M</i> <i>The requirement is that a Licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.</i></p> | |
| <p>Corrective Action recommended from previous audit Licensee to develop a compliance manual that has scheduled reminders for regulatory compliance items.</p> | |
| <p>Action taken since last audit The licensee was late in providing the 2010 and 2011 Compliance Reports. However the licensee now has in place a process to ensure compliance with the above obligation.</p> | |
| <p>Recommendation Licensee to consider reviewing the process for complying with the above obligation to ensure it continues to provide the required outcome.</p> | |
| <p>Current status Compliant</p> | |

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| Item (113) 113 Trading Licence Schedule 3 Clause 3.1 | Compliance Rating Non-compliant – 2 |
| <p><i>Energy Coordination Act section 11M</i> <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.</i></p> | |

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| Corrective Action recommended from previous audit |
| Develop a scheduled procedure to advise Minister of change in tariff at least a month before the change. |
| Action taken since last audit |
| Licensee has implemented a process to ensure the Minister is notified 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. |
| Current status |
| Compliant |

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|--|--|
| Item (124) 124 Trading Licence Clause 21.1 and 21.2 | Compliance Rating Non-Compliant – 2 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i> <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.</i> | |
| Corrective Action recommended from previous audit The Licensee should seek an amendment to the licence from providing redundant information and in the interim provide the prescribed information. | |
| Action taken since last audit The licensee provides all new customers with an information pack that provides all the information required. | |
| Current status Compliant | |

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| Item (158) 156 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1) | Compliance Rating Non-Compliant – 2 |
| <i>Energy Coordination Act section 11M</i> <i>A retailer must include minimum prescribed information on the customer's bill, unless the customer agrees otherwise.</i> | |
| Corrective Action recommended from previous audit Amend bill to include TTY service number. Seek an amendment of the licence from providing a bar graph and in the interim investigate methods of providing the prescribed graphical information. | |
| Action taken since last audit The licensee has amended the bill to include the TTY service number and a bar graph but still needs to include the national interpreter symbol. | |
| Recommendation The licensee to further amend the bill to include the national interpreter symbol. | |
| Current status Non-compliant | |

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| Item (209) 204 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(2) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> <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).</i> | |
| Corrective Action recommended from previous audit | |

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| Finalise consultation of hardship policy and set up process for scheduled annual consultation. |
| Action taken since last audit The licensee now has a hardship policy and a process in place to ensure the policy is reviewed in accordance with the Authority's guidelines and time frame. |
| Current status Compliant |

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| Item (214) 209 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(1) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> <i>A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.</i> | |
| Corrective Action recommended from previous audit Finalise the hardship policy including the required consultation | |
| Action taken since last audit .The licensee has developed and implemented a hardship policy and undertaken the required consultation. | |
| Current status Compliant | |

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|--|--------------------------------------|
| Item (215) 210 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> <i>A retailer must ensure that the hardship policy complies with the specified criteria.</i> | |
| Corrective Action recommended from previous audit Finalise the hardship policy including the required consultation. | |
| Action taken since last audit The licensee has finalised and published its hardship policy. The policy complies with the specified criteria. | |
| Current status Compliant | |

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|--|--------------------------------------|
| Item (217) 212 Trading Licence clause 2.1 and Schedule Compendium clause 6.10(4) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> <i>A retailer must keep a record of the specified information related to the hardship policy.</i> | |
| Corrective Action recommended from previous audit Finalise the hardship policy and keep the required records. | |
| Action taken since last audit . The licensee has finalised and published its hardship policy and put in place a process to record the specified information. | |
| Current status Compliant | |

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|--|--------------------------------------|
| Item (228) 226 Trading Licence clause 2.1 and Schedule 2 Compendium 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. | |
| Corrective Action recommended from previous audit Develop a scheduled annual procedure to include a notice with the bill prior to a tariff increase. | |
| Action taken since last audit An examination of a sample of bills shows that the licensee only increases the tariff by CPI. Although each bill has a statement that alerts the customer to this fact when the change in CPI occurs no further information on the change is provided to the customer. | |
| Recommendation Licensee to alert the customer via the bill to a CPI increase immediately prior to the increase occurring and to quantify on the bill details of the change to the tariff. | |
| Current status Non-compliant | |

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| Item (245) 242 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2) | Compliance rating 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, on the documents specified. | |
| Corrective Action recommended from previous audit Add TTY service to bill, and TTY and special information services information on overdue warnings and disconnection notices. | |
| Action taken since last audit The above information is now included on the above documents. | |
| Current status Compliant | |
| Recommendation Although the licensee includes the above information consideration should be given to including the symbol. | |

5.4 Suggestions for Improvement from Previous Audit

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| Item (236) 233 Trading Licence clause 2.1 and Schedule 2 Compendium 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. | |
| Opportunity for Improvement Add information on energy efficiency or references to where it may be readily obtained to web site and customer charter. (Non- mandatory recommendation audit guidelines 11.4). | |
| Action taken The licensee now has a document that provides the above information it is titled Energy Efficiency Information and is provided as part of the package sent to new customers' which is also on the website. | |
| Current status Compliant | |

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|---|--------------------------------|
| Item (268) 262 Trading Licence clause 2.1 and Schedule2 Compendium clause 13.17(3) | Compliance rating Not rated |
| <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 | |

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| <i>it is published.</i> |
| Opportunity for Improvement Develop a compliance manual with scheduled reminders for regulatory compliance issues. |
| Action taken A schedule has been developed by the licensee to ensure that regulatory compliance issues are dealt with within the required time-frame. |
| Current status Compliant |

5.5 Compliance Elements Requiring Corrective Measures Current Audit

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|---|----------------------------|--------------------------------------|
| Item 82/82 | Trading Licence Clause 5.1 | Compliance rating Non-compliant-2 |
| <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined a number of bills | | |
| Observations During the audit period the licensee has not included advice with the bill that a copy of the service charter is available free of charge. The requirement is to provide the information from time to time. Therefore it could be reasonably expected that this information should be provided at least once during the audit period. Recently the need to have a customer service charter was removed from the licence and the following advice on the issue was provided by the Authority. <i>"The Secretariat has sought legal advice regarding gas trading licences and customer service charter. The result is that gas trading licensees are no longer required to provide a charter, because this obligation has been removed from the licence. As a consequence, the parts of the Energy Coordination (Customer Contracts) Regulations 2004 that refer to customer service charter, now only apply in situations where the licensee wishes to provide a charter to customers voluntarily."</i> Therefore in the future the need for a licensee to provide a customer service charter is voluntary. | | |
| Compliance summary Non-compliant | | |
| Corrective Action/Opportunity for Improvement Licensee to include this information on or with the bill from time to time. | | |

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| Item 147/156 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1)(a)-(cc) on the customer's bill. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations The licensee has amended the bill to include the TTY service number and a bar graph but still needs to include the national interpreter symbol. The licensee was unable to include the TTY symbol in it's off the shelf current billing system but will be incorporating it on the bill when the new software package (ProjectSight) currently being developed in-house is implemented. | | |
| Compliance summary Non-compliant | | |
| Corrective Action/Opportunity for Improvement Include the national interpreter symbol on bill. | | |

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| Item 155/162 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2) | Compliance rating Non-compliant-1 |
| <i>Energy Coordination Act section 11M</i> In circumstances where the customer's bill is estimated, a retailer must specify in a visible and legible manner the information specified in subclause 4.8(2)(a)-(c) The customer may request a verification of a meter reading and a meter reading. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations During the audit period customers were provided with estimated bills and although the bill does not make any reference to the fact that it has been estimated a compliment slip is included stating the bill has been estimated. The licensee's current billing software does not allow for notifications of this type to be included as part of the bill. The new ProjectSight software under development by the licensee will provide this feature and allow the required information to be included when a bill is estimated. | | |
| Compliance summary Non-compliant | | |
| Corrective Action/Opportunity for Improvement Bill to include a reference to the fact that it is estimated and if requested by the customer the retailer will tell the customer the basis of the estimation and the reason for the estimation as required under clause 4.8 of the Compendium. | | |

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| Item 222/220 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1 | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> A retailer must follow the procedures specified in subclause 7.1(1) prior to arranging for disconnection of a customer's supply address for failure to pay a bill. A customer has failed to pay a bill in the circumstances specified in subclause 7.1(2). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined disconnection process | | |
| Observations The licensee provides the customer with a reminder notice that includes the licensee's telephone number, advice how the licensee may assist the customer if they are experiencing payment difficulties or financial hardship and giving the customer time to pay. If the bill remains unpaid the licensee will then endeavour to contact the customer by telephone or electronic means and if the matter cannot be resolved this is followed by a final notice of disconnection. Neither of the letters contain information on the complaints handling process of the licensee. | | |
| Compliance summary Not-compliant | | |
| Corrective Action/Opportunity for Improvement Licensee to include information on disconnection correspondence that it has a complaints handling process and how it operates. | | |

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| Item 239/237 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4 | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, general information on (including referring a | | |

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| customer to a relevant information source); how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations The licensee has a publication that is available to customers on general energy efficiency information. However, it does not contain information on how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. |
| Compliance summary Non-compliant |
| Corrective Action/Opportunity for Improvement Licensee to amend its publication on energy efficiency to include how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. |

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| Item 250/246 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> A retailer and, where appropriate, a distributor must include on a residential customer's bill and bill related information, reminder notice and disconnection warning: the telephone number for their TTY services; the telephone number for independent multi-lingual services; the National Interpreter Symbol with the words "Interpreter Services". | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations Examined above documentation. All the information is provided with the exception of the National Interpreter Symbol. The licensee's current billing software does not allow for notifications of this type to be included as part of the bill and on other documentation. The new ProjectSight software under development by the licensee will provide this feature and allow the required information to be included. | |
| Compliance summary Non-compliant | |
| Corrective Action/Opportunity for Improvement Licensee to include the National Interpreter Symbol on a residential customer's bill and bill related information, reminder notice and disconnection warning. | |

5.6 Suggestions for Improvement current audit

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| Item 72/72 Trading Licence Clause 5.1 | Compliance rating Compliant-3 |
| Licence: <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined metering 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 metering database. The action taken is left to the discretion of Esperance Business Support Officer 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. | |

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| At the time of the audit 10 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 The process for assisting customers, needs to be documented together with the action taken. A checklist would assist and could be used as a record. |

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| Item 79/79 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined disconnection warning letter | | |
| Observations The disconnection and final notice provides information on the energy ombudsman and contains a comment to contact the licensee if they have a complaint. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement The notice should be amended to make reference to the complaints handling process. | | |

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| Item 81/81 | Trading Licence Clause 5.1 | Compliance rating Compliant-4 |
| <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined customer charter on website. | | |
| Observations 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. One request was received during the audit period and the charter was provided in the required time-frame. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement The charter needs to be updated as some of the references are not correct if the licensee intends to still make it publicly available. | | |

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| Item 181/181 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1 | Compliance rating Compliant-4 |
| <i>Energy Coordination Act section 11M</i> The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |

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| Examined billing data records |
| Observations After examining a number of bills that were issued during the audit period, the due date on the bill is always more than 12 business days from the date the bill was dispatched. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement Bill could be improved if it showed date on which it is dispatched. Shows reading date and due date. |

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| Item 204/204 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1) | Compliance rating Compliant-4 |
| <i>Energy Coordination Act section 11M</i> If the assessment carried out under clause 6.1 indicates to the retailer that the residential customer is experiencing payment difficulties or financial hardship, the retailer must follow the procedure specified in subclause 6.3(1). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations 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. Currently 66 customers are on a Centerpay arrangement. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement Although the licensee complies with this obligation no documented process for staff to follow exists. Consideration to be given to documenting the process to be followed including a check list that needs to be completed for record purposes. | |

5.7 Post Audit Implementation Plan

The Licensee will provide a post audit implementation plan.

6.0 APPENDIX 1- PERFORMANCE AUDIT DETAILS

6.1 Detailed Audit Findings

The following sets out the audit findings. The obligations are listed as they appear in the 2013/10 Gas Compliance Reporting Manual.

Licence Compliance Requirements – Energy Coordination Act 1994

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| Item 1/1 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). | |
| Verification/Tests Interviewed Business and Regulatory Manager Obtained a copies of the invoices and payment sheets | |
| Observations Established date when invoice was received and fees were paid. The licensee has a process in place to ensure licence fees are paid within the required time frame and during the audit period the fees were paid within the required timeframe.. | |
| Compliance summary: Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 2/2 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined information pack sent to new consumers and Small Use Gas Supply Agreement Terms and Conditions | |
| Observations The licensee has 5 business and 323 domestic customers all of whom are on the licensee's standard form contract approved by the Authority. Every potential customer is provided with a copy of the contract and before gas supply commences is required to sign the contract and return the signed portion to the licensee. The signed document signifying the customer's acceptance is filed by the licensee. A check on the website showed that the document is available on the website. | |
| Compliance summary: The licensee is compliant as supply is subject to the standard form contract. | |
| Corrective Action/Opportunity for Improvement | |

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| Item 3/3 TradingLicenceClause13.1 | Compliance rating Compliant-5 |
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| <i>EnergyCoordinationActsection11WG(2)</i> | |
| The requirement is that a Licensee must comply with a direction given to the Licensee under section 11WI. | |
| Verification/Tests | |
| Interviewed Business and Regulatory Manager Contacted Authority to determine if the licensee had been provided with any directions to review their standard form contract. | |
| Observations | |
| The <i>Authority</i> issued a direction requiring the standard form contract be reviewed on 31/1/2011. The licensee reviewed the standard form contract and submitted the document to the Authority the document was approved effective 7 October 2011. | |
| Compliance summary: | |
| Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 4/4 | 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. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager Examined Small Use Gas Supply Agreement Terms And Conditions (contract) and new customer information package. | | |
| Observations | | |
| The licensee has 5 business and 323 domestic customers all of whom are on the licensee's standard form contract approved by the Authority. Every potential customer is provided with a copy of the contract and before gas supply commences is required to sign the contract and return the signed portion to the licensee. The signed document signifying the customer's acceptance is filed by the licensee. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 5/5 | 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. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager Examined Standard Form Contract | | |
| Observations | | |
| Licensee provides supply to all customers in accordance with the Standard Form Contract. Licensee does not have any customers on non-standard contracts. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 6/6 | Trading Licence Clause 5.1 | Compliance rating |
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| | Not rated |
| <p><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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager</p> | |
| <p>Observations No interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause occurred during the audit period. However should such an event occur the licensee has processes in place to minimise the extent of the duration</p> | |
| <p>Compliance summary: Not rated</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 10/10 Trading Licence Clause 18.1 | Compliance rating Compliant - 5 |
| <p><i>Energy Coordination Act section 11ZA(1)</i> 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> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager Examined letter from Authority approving Achieve It Consulting as the auditor.</p> | |
| <p>Observations Achieve It Consulting with the approval of the Authority has been appointed to undertake the performance audit. The audit Period is 1 September 2010 to 31 August 2013</p> | |
| <p>Compliance summary: Compliant</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 17/17 Trading Licence Clause 5.1 | Compliance rating Not Applicable |
| <p><i>Energy Coordination Act section 11ZK (3)</i> 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> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager</p> | |
| <p>Observations The licensee has no interest in or holds an easement in respect of land held by a public authority</p> | |
| <p>Compliance summary: Not Applicable</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 24/24 Trading Licence Clause 20 | Compliance rating |
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| | Compliant-5 |
| <p><i>Energy Coordination Act section 11ZQH</i></p> <p>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.</p> | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager</p> <p>Examined payments ledger</p> | |
| <p>Observations</p> <p>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.</p> | |
| <p>Compliance summary:</p> <p>Compliant</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

Licence Compliance Requirements – Gas Standards Act 1972

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| Item 25/25 | Trading Licence Clauses 5.1 | Compliance rating Compliant - 5 |
| <p><i>Energy Coordination Act section 11Z</i></p> <p>The requirement is that a Licensee must comply with the standards of the <i>Gas Standards Act 1972</i>.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Area Manager</p> <p>Examined <i>Gas Standards Act 1972</i></p> | | |
| <p>Observations</p> <p>The licensee has complied with all the standards of the <i>Gas Standards Act 1972</i>.</p> <p>Discussion with EnergySafety confirmed that the licensee has complied with with the regulatory requirements throughout the audit period.</p> | | |
| <p>Compliance summary:</p> <p>Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

Licence Compliance Requirements – Energy Coordination (Customer Contracts) Regulations 2004

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| Item 32/32 | Trading Licence Clause 5.1 | Compliance rating Compliant -5 |
| <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations The policy of the Licensee is to disconnect consumers only as a last resort. All customers are given every opportunity to either pay their bill or enter into arrangements with the licensee regarding payment. During the audit period, although all customers agree to the Standard Form Contract which contains a number of provisions relating to the payment of gas including the required prohibitions, a number of customers have entered into additional arrangements with the licensee in relation to payment for gas supplied. No 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 was received during the audit period as part of the process to disconnect a customer. All disconnections were in accordance with the flow chart developed by the licensee and the requirements of the regulations. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 33/33 | 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). | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection Examined disconnection letter and warning letter | | |
| Observations The licensee provides 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). A number of disconnections occurred during the audit period but I can only confirm that the disconnections that occurred following the appointment of the new Business Support Officer in January of 2013 for non-payment were subject to the above process. No information is available regarding the process followed by the licensee for the disconnections reported in the 2010/2011 annual performance report. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 34/34 | 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). | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection Examined disconnection letter and warning letter | | |
| Observations The licensee provides the customer with a disconnection warning letter that complies with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 35/35 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination (Customer Contracts)Regulation 12 (5)(a)</i> 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 Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for reconnection | | |
| Observations The Licensee following disconnection reconnected 3 customers during the audit period. All reconnections were in accordance with the licensee's reconnection process which complied with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 36/36 | Trading Licence Clause 5.1 | Compliance Rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 12.(5)(b)</i> 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 Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | | |
| Observations The Licensee has not reconnected any consumers during the audit period for the above reason as no disconnection occurred because of denial of access to a meter. | | |

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| However, the licensee process for reconnection would ensure compliance with this obligation. | |
| Compliance summary | |
| Not rated | |
| Corrective Action/Opportunity for Improvement | |
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| Item 37/37 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations The licensee has not disconnected a consumer for unlawful consumption of gas. Therefore a reconnection of this type has not occurred | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement None | |

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| Item 38/38 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations The Licensee has no customer subject to a refundable advance therefore this obligation did not apply during the audit period. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |
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| Item 39/39 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations No reconnections took place during the audit period following a disconnection for an emergency situation or for health, safety or maintenance reasons. However, should this occur the licensee would reconnect subject to complying with the above obligation. | |
| Compliance summary | |

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| Not rated |
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| Item 40/40 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection.</p> | | |
| <p>Observations 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.</p> | | |
| <p>Compliance summary Not rated</p> | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 41/41 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection</p> | | |
| <p>Observations No disconnection of a business customer occurred during the audit period. However, should it be necessary to consider disconnecting a business customer the licensee would comply with the above obligation.</p> | | |
| <p>Compliance summary Not rated</p> | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 42/42 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <p><i>Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.2.1 & 5.1.2.2</i> 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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection</p> | | |
| <p>Observations The licensee has not disconnected any customer during the audit period for the above reason. However, should such a situation arise the licensee would comply with the above obligation.</p> | | |
| Compliance summary | | |

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| Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item 43/43 Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> 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 Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations No disconnections for emergency events occurred in the audit period. If such an event occurred the licensee would comply with the above obligation. | |
| Compliance summary: Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 44/44 Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.4.1 & 5.1.4.2 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations No disconnection for the above reasons occurred during the audit period | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 45/45 Trading Licence Clause 5.1 | Compliance rating Not applicable |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.5.1 & 5.1.5.2 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | |
| Observations Disconnections of this type would be the responsibility of the distributor. No such disconnections occurred during the audit period. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item 46/46 Trading Licence Clause 5.1 | Compliance rating |
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| | Not rated |
| <p><i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.7.2</p> <p>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.</p> | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> <p>Examined process used by licensee for disconnection/reconnection</p> | |
| <p>Observations</p> <p>Licensee has no refundable advances therefore this obligation did not apply during the audit period.</p> | |
| <p>Compliance summary</p> <p>Not rated</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 47/47 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(a)</p> <p>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.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> <p>Examined process used by licensee for disconnection/reconnection</p> | | |
| <p>Observations</p> <p>The 5 disconnections that occurred during the audit period following the appointment of the new Business Support Officer in January 2013 did not contravene the above obligation. The process used by the licensee ensures that a disconnection will not occur where the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay.</p> | | |
| <p>Compliance summary</p> <p>Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 48/48 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <p><i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(b)</p> <p>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.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> <p>Examined process used by licensee for disconnection/reconnection</p> <p>Checked complaint register</p> | | |
| <p>Observations</p> <p>Examination of register verified that no complaints occurred during the audit period.</p> | | |
| <p>Compliance summary</p> <p>Not rated</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 49/49 | Trading Licence Clause 5.1 | Compliance rating Not applicable |
| <p><i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(c)</p> <p>A licensee must not disconnect supply where an application for a government concession has not been decided.</p> | | |

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| Verification/Tests |
| Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection |
| Observations |
| Licensee does not offer government concessions therefore this obligation does not apply.. |
| Compliance summary |
| Not applicable |
| Corrective Action/Opportunity for Improvement |

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| Item 50/50 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(d) A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection Examined customer accounts | | |
| Observations Examination of consumer accounts verified that no disconnections of this type occurred during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 51/51 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(e)&(f) 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | | |
| Observations . Examination of the disconnection process verified compliance with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 52/52 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.2.2.2 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined process used by licensee for disconnection/reconnection | | |
| Observations The process followed by the licensee since the appointment of the new Business Support Officer in January 2013 has been to reconnect the customer that day if the request is received before 4.00pm. Otherwise the reconnection occurs the following business day. The 3 reconnections that occurred after January 2013 | | |

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| complied with this process. . |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 53/53 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 13(1)</i> AGA Code Clause 4.4.6.2 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined records and customer accounts | | |
| Observations Licensee has no refundable advances. Examination of consumer records and accounts verified that refundable advances have not occurred during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 54/54 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined records and customer accounts | | |
| Observations Licensee has no refundable advances. Examination of consumer records and accounts verified that refundable advances have not occurred during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 55/55 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined records and customer accounts | | |
| Observations Licensee has no refundable advances. Examination of consumer records and accounts verified that refundable advances have not occurred during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 56/56 | Trading Licence Clause 5.1 | Compliance rating |
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| | Compliant-5 |
| <p><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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager Examined welcome letter</p> | |
| <p>Observations The small use gas supply agreement terms and conditions contains an explanation on the supply charge. This contract applies to both residential and business customers.</p> | |
| <p>Compliance summary: Compliant</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 57/57 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination (Customer Contracts)Regulation 14(3) AGA Code Clause 4.1.2.1 & 4.1.2.2</i> A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager Examined records and customer accounts</p> | | |
| <p>Observations No request was received from a customer during the audit period for information on the tariff charged. However all customers are provided information on their bill that the tariff is subject to CPI and when the tariff changes. The licensee would provide the required information on request.</p> | | |
| <p>Compliance summary: Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 58/58 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination (Customer Contracts)Regulation 14 AGA Code Clause 4.1.3.1 & 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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager Examined a sample of customer bills that were issued during the audit period</p> | | |
| <p>Observations An examination of a sample of bills shows that the licensee only increases the tariff by CPI. Each bill has a statement that alerts the customer to this fact. A further note is added to the bill immediately prior to the tariff changing informing the customer that the charges have changed in line with CPI.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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

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| A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined billing process and number of consecutive bills to confirm the above obligation is complied with. | |
| Observations Bill sent every three months to residential customers and every month to business customers. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 60/60 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> 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 Business and Regulatory Manager Examined a sample of customer bills that were issued during the audit period | | |
| Observations The information contained in the bill contains all the information required in the AGA code. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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

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| Item 62/62 | Trading Licence Clause 5.1 | Compliance rating Not applicable |
| <i>Energy Coordination (Customer Contracts) Regulation 15(1) & 15(2)</i> If a customer does not direct how a payment is to be allocated, a licensee must apply the payment — (i) to charges for the supply of gas before applying any portion of it to such goods or services; or (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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined customer bills. | | |
| Observations As no charges for goods and services occur all payments are allocated to the charges associated with supplying the gas. | | |

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| Compliance summary |
| Not applicable |
| Corrective Action/Opportunity for Improvement |

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| Item 63/63 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts) Regulation 15(1), 47(2) & (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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined customer database | | |
| Observations No request for bill data has been received during the audit period. However, should the licensee be requested to provide the above data the licensee confirmed it would be made available free of charge. Examination of the billing database confirmed the data is available. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 64/64 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined bills and customer database. | | |
| Observations Licensee reads the meter once every three months and the bill is based on meter readings. If bill needs to be estimated an actual meter reading is carried out at least once a year. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 65/65 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined billing database | | |
| Observations A number of customers read their meter on behalf of the licensee and the licensee ensures compliance with the above obligation. Examination of customer bills confirmed compliance with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 66/66 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
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| <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. |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined customer bills Examined database |
| Observations The licensee when it is able to read the meter adjusts the bill to the correct amount if the bill was previously estimated. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 67/67 | Trading Licence Clause 5.1 | Compliance rating Not Rated |
| Licence: <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations No customer requests for a meter read occurred during the audit period. However should a request be received the reading would be carried and subject to a charge. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 68/68 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| Licence: <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined bill | | |
| Observations The Bill clearly states the payment options available which include payment in person and payment by mail | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 69/69 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| Licence: <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |

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| Observations |
| 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. |
| Compliance summary |
| Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item 70/70 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations No contracts were terminated during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 71/71 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations 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 | | |

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| Item 72/72 | Trading Licence Clause 5.1 | Compliance rating Compliant-3 |
| Licence: Trading | | |

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| <p><i>Energy Coordination (Customer Contracts)Regulation 20(2)</i> AGA Code Clause 4.3.5.1</p> <p>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.</p> |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> <p>Examined metering database</p> |
| <p>Observations</p> <p>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 metering database. The action taken is left to the discretion of Esperance Business Support Officer 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.</p> <p>At the time of the audit 10 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.</p> |
| <p>Compliance summary</p> <p>Compliant</p> |
| <p>Corrective Action/Opportunity for Improvement</p> <p>The process for assisting customers, needs to be documented together with the action taken. A checklist would assist and could be used as a record.</p> |

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| <p>Item 73/73 Trading Licence Clause 5.1</p> | <p>Compliance rating</p> <p>Not rated</p> |
| <p><i>Energy Coordination (Customer Contracts)Regulation 27(4) & 40(3)</i></p> <p>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.</p> | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> <p>Examined Standard Form Contract</p> | |
| <p>Observations</p> <p>The licensee does not engage in door to door marketing. The initial approach is always from a builder, gasfitter or person who wants to connect to the distribution system.</p> <p>The contract terms and conditions provide for the contract to be cancelled during a 10 day cooling off period if it is a door to door contract</p> | |
| <p>Compliance summary</p> <p>Not rated</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| <p>Item 74/74 Trading Licence Clause 5.1</p> | <p>Compliance rating</p> <p>Not rated</p> |
| <p><i>Energy Coordination (Customer Contracts)Regulation 20(3) & 48</i></p> <p>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.</p> | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> | |
| <p>Observations</p> <p>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.</p> | |
| <p>Compliance summary</p> <p>Not rated</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 75/75 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <i>Energy Coordination (Customer Contracts)Regulation 22 & 49(2)</i> A licensee must only provide a credit reporting agency with default information relevant to one of their bills. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations No information was provided to a credit reporting agency during the audit period and currently it is not the policy of the licensee to provide information relating to customers to a credit reporting agency | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 76/76 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations 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. Currently it is not the policy of the licensee to provide information relating to customers to a credit reporting agency. | | |
| Compliance summary Not rated. | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 77/77 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations 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. Currently it is not the policy of the licensee to provide information relating to customers to a credit reporting agency. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 78/78 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations No information was provided to a credit reporting agency during the audit period. | | |
| Compliance summary | | |

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| Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 79/79 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined disconnection warning letter | | |
| Observations The disconnection and final notice provides information on the energy ombudsman and contains a comment to contact the licensee if they have a complaint. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement The notice should be amended to make reference to the complaints handling process. | | |

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| Item 80/80 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations No non-standard contracts exist. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 81/81 | Trading Licence Clause 5.1 | Compliance rating Compliant-4 |
| <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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined customer charter on website. | | |
| Observations 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. One request was received during the audit period and the charter was provided in the required time-frame. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement The charter needs to be updated as some of the references are not correct. | | |

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| Item 82/82 | Trading Licence Clause 5.1 | Compliance rating Non-compliant-2 |
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| <p><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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined a number of bills</p> | |
| <p>Observations During the audit period the licensee has not included advice with the bill that a copy of the service charter is available free of charge. The requirement is to provide the information from time to time. Therefore it could be reasonably expected that this information should be provided at least once during the audit period. Recently the need to have a customer service charter was removed from the licence and the following advice on the issue was provided by the Authority. <i>"The Secretariat has sought legal advice regarding gas trading licences and customer service charter. The result is that gas trading licensees are no longer required to provide a charter, because this obligation has been removed from the licence. As a consequence, the parts of the Energy Coordination (Customer Contracts) Regulations 2004 that refer to customer service charter, now only apply in situations where the licensee wishes to provide a charter to customers voluntarily."</i> Therefore in the future the need for a licensee to provide a customer service charter is voluntary.</p> | |
| <p>Compliance summary Non-compliant</p> | |
| <p>Corrective Action/Opportunity for Improvement Licensee to include this information on or with the bill from time to time.</p> | |

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| Item 83/83 | Trading Licence Clause 5.1 | Compliance rating Not rated |
| <p><i>Energy Coordination (Customer Contracts) Regulation 46(1)& (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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> | | |
| <p>Observations 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.</p> | | |
| <p>Compliance summary Not rated</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 84/84 | Trading Licence Clause 5.1 | Compliance rating Compliant-5 |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined at the Esperance office a copy of <i>Energy Coordination (Customer Contract) Regulations 2004</i> and other legislative documents and industry codes</p> | | |
| <p>Observations 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.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 85/85 | 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 | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined standard form contract terms and conditions | | |
| Observations The contract s contains a provision that the distributor provides, installs and maintains equipment for the supply of gas up to the point of supply | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 86/86 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer Examined contract terms and conditions | | |
| Observations Contract contains a provision that the distributor provides, installs and maintains metering and necessary equipment at the supply address. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 90/90 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Area Manager Examined licensee's official identity card | | |
| Observations Identity card issued to all employees that require access to customer's property shows holder is representative of the licensee. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 91/91 | 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager and Esperance Business Support Officer | | |
| Observations Licensee has no non-standard contracts. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

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| Item 96/96 | Trading Licence Clause 18. | Compliance rating Compliant-5 |
| <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. | | |
| Verification/Tests Auditor provided with a copy of the <i>Authority's</i> standard guidelines dealing with the performance audit. | | |
| Observations The performance audit was carried out in compliance with the <i>Authority's</i> standard guidelines dealing with the performance audit. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 97/97 | 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. | | |
| Verification/Tests Examined letter from Authority confirming approval of auditor | | |
| Observations Letter confirms that Authority approved the auditor | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 98/98 | Trading Licence Clause 19 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A licensee may be subject to individual performance standards. | | |
| Verification/Tests Interviewed Business and Regulatory Manager Checked made with Authority | | |
| Observations No individual performance standards were imposed during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 99/99 | Trading Licence Clause 20 | Compliance rating |
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| | Not rated |
| <p><i>Energy Coordination Act section 11M</i></p> <p>Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.</p> | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager and Esperance Business Support Officer</p> | |
| <p>Observations</p> <p>All notices are provided in writing. However during the audit period there were no notices in respect of the licence.</p> | |
| <p>Compliance summary</p> <p>Not rated</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 100/100 | Trading Licence Clause 23.1 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination Act section 11M</i></p> <p>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.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Financial Controller - Asset Services Examined accounting documentation</p> | | |
| <p>Observations</p> <p>Confirmed accounting records comply with the required standards</p> | | |
| <p>Compliance summary</p> <p>Compliant.</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 101/101 | Trading Licence Clause 24 | Compliance rating Not rated |
| <p><i>Energy Coordination Act section 11M</i></p> <p>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.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager</p> | | |
| <p>Observations</p> <p>The Licensee has not been under external administration or experienced a significant change in its corporate, financial or technical circumstances during the audit period.</p> | | |
| <p>Compliance summary</p> <p>Not rated</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item 102/102 | Trading Licence Clause 21. | Compliance rating Compliant-5 |
| <p><i>Energy Coordination Act section 11M</i></p> <p>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>.</p> | | |
| <p>Verification/Tests</p> <p>Interviewed Business and Regulatory Manager Contacted Authority to determine if this obligation had been complied with. Examined records to establish when delivery of the reports occurred.</p> | | |
| <p>Observations</p> | | |

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| Information provided by the Authority indicated the licensee was late in providing the 2010 and 2011 Compliance Report. However this proved to be incorrect following examination of a letter from the Authority to the licensee confirming that the reports had been provided within the required time frame. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 103/103 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager | |
| Observations Licensee was not required by the Authority to publish any information during the audit period. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 106/106 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager Contacted Authority to request if the Authority had issued a direction that the standard form contract be reviewed. | |
| Observations The Authority requested a review of the standard form contract on 31/1/2011. The document was reviewed by the licensee and approval was provided by the Authority effective 7 October 2011. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 107/107 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager Contacted Authority to request if the Authority had issued a direction that the standard form contract be reviewed. | |
| Observations The Authority requested a review of the standard form contract (SFC) on 31/1/2011. The document was reviewed by the licensee and approval was provided by the Authority effective 7 October 2011. In June 2012 the Authority sent a letter to the licensee advising that the licensee undertake its own review of the SFC to ensure it complies with the Australian Consumer Law. The licensee complied with this request. | |
| Compliance summary | |

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| Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 108/108 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined contract | |
| Observations The standard form contract has been reviewed during the audit period and the amendments are in accordance with the Energy Coordination Act 1994 and Regulations. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 109/109 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. | |
| Verification/Tests Interviewed Business and Regulatory 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 Compliant | |

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| Item 110/110 Trading Licence Schedule 3 Clause 1.5 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must provide the <i>Authority</i> within 3 business days of a request by the <i>Authority</i> with reasons for refusing to commence supply to a customer if requested by the <i>Authority</i> . | |
| Verification/Tests Interviewed Business and Regulatory Manager Contacted Authority to request if the Authority had issued a request. | |
| 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 | |

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| Item 111/111 Trading Licence Schedule 3 Clause 1.7 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> The requirement is that a Licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions. | |

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| Verification/Tests |
| Interviewed Business and Regulatory Manager Contacted Authority to request if the Authority had issued a direction. |
| 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 |

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| Item 112/112 | 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. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager Interviewed office staff at Esperance. | | |
| Observations | | |
| As the office staff represent both licence holders, information flows freely between the retailer and the distributor. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 113/113 | 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. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager | | |
| Observations | | |
| The licensee has a process in place to ensure the Minister is informed of proposed price changes more than one month prior to the change being implemented. The change in pricing has been to increase the tariff by CPI at regular intervals during the audit period. The Minister has been informed of the change more than one month prior to the change taking place. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

LICENCE COMPLIANCE REQUIREMENTS – GAS MARKETING CODE OF CONDUCT

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| Item 114/114 | Trading Licence Clauses 19.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP</i> A licensee must comply with the <i>Gas Marketing Code of Conduct</i> . | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations | | |

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| The licensee is aware of the need to comply with the requirements of the Gas Marketing Code of Conduct and the requirements that apply to the licensee have been complied with during the audit period. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 115/115 Trading Licence clause 19.2 | Compliance rating Compliant-5 |
| <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> . | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee only has 2 employees based in Esperance the Area Manager and the Business Services Officer both employees are familiar with the requirements of the above code. However, they do not undertake marketing activities, they only respond to builder/gasfitter and consumer requests for gas supply. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 116/116 Trading Licence Clause 19.1 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A retailer must ensure that its gas marketing agents comply with Part 2 of the Code of Conduct. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations All matters relating to gas supply are handled by the two Esperance staff (Manager and Support Officer). The only marketing undertaken is responding to requests from builders/gasfitters or the public about becoming a customer and arranging for a contract to be sent to a new customer together with other information in a welcome pack. No negotiation regarding contracts is undertaken as all customers are subject to the licensee's standard contract. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 117/117 Trading Licence Clause 19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)</i> A retailer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | |
| Observations Following a request from a builder/gasfitter or potential customer the licensee sends an information pack to the customer. The pack contains a standard form contract which includes an explanation about unsolicited consumer agreements and cooling off periods. A copy of the Marketing Code of Conduct is also included. The customer is required to complete the Schedule at the back of the contract and return it to the licensee before gas supply is commenced. The licensee has no non-standard contracts. | |
| Compliance summary | |

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| Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 118/118 Trading Licence clause 19 | Compliance rating Compliant-5 |
| Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1) A gas marketing agent 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | |
| Observations Examined process for connecting new customer to the distribution system and conformed that specified information is provided to the customer before the contract is signed. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 119/119 TradingLicenceClause19 | Compliance rating Compliant -5 |
| Licence: <i>Trading</i> | |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)</i> For a standard form contract that is not an unsolicited consumer agreement or for a non-standard contract in accordance with clause 2.2(2) of the Code of Conduct, the gas marketing agent must obtain and record the customer's verifiable consent that the specified information was given. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | |
| Observations All customers receive the information pack and are required to complete and return to the licensee Appendix B Gas Supply request and agreement form of the Standard Form Contract. This is considered to satisfy the above obligation. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item120/120 Trading Licence Clause 19 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)</i> For a standard form contract that is an unsolicited consumer agreement or a non-standard contract other than in accordance with clause 2.2(2) of the Code of Conduct, the gas marketing agent must obtain the customer's written acknowledgement that the specified information was given. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | |
| Observations During the audit period no unsolicited consumer agreement or non-standard contract were entered into therefore unable to rate this obligation. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item121/121 | Trading Licence Clause19 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)</i> When a customer enters into a new contract that is not an unsolicited consumer agreement with a retailer or gas marketing agent, a retailer or gas marketing agent must, at the time the contract is entered into, offer to give or make available to the customer a copy of the contract. If the customer accepts the offer, the retailer or gas marketing agent must, at the time the contract is entered into, or as soon as possible thereafter, but no more than 28 days later, give or make available to the customer a copy of the contract.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system.</p> | | |
| <p>Observations All customers receive the information pack that includes a copy of the Standard Form Contract and are required to complete and return to the licensee Appendix B Gas Supply request and agreement form of the Standard Form Contract. This is considered to satisfy the above obligation.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item122/122 | Trading Licence Clause19 | Compliance rating Compliant-5 |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system.</p> | | |
| <p>Observations The licensee provides the required information in the information pack provided to the customer as part of the process of signing up a new account.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item123 | TradingLicenceClause19 | Compliance rating Compliant-5 |
| <p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(3)</i> For a standard form contract, the retailer must give the information specified to the customer no later than with the customer's first bill. For a non-standard form contract or a standard form contract that is an unsolicited consumer agreement, the specified information must be given before the customer has entered into the contract. The gas marketing agent must obtain the customer's written acknowledgement that the specified information has been given.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system.</p> | | |
| <p>Observations The licensee provides the specified information to the customer in the information pack prior to providing gas supply.</p> | | |
| <p>Compliance summary Compliant</p> | | |

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| Corrective Action/Opportunity for Improvement |
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| Item 124 | Trading Licence Clause 19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(4)</i> The retailer is not obliged to provide the information to a customer if the retailer has provided the information to that customer within the preceding 12 months; or if the retailer informs the customer how the customer may obtain the information and, if requested, gives the information to the customer. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | | |
| Observations The licensee provides all new customers with an information pack that contains all the information required under the code. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 125 | Trading Licence Clause 19 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i> A gas marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | | |
| Observations The licensee does not offer any concessions. | | |
| Compliance summary not applicable | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 126 | Trading Licence Clause 19 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)</i> A gas marketing agent must ensure that all non-standard contracts that are not unsolicited consumer agreements are in writing. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations The licensee does not have or offer any non-standard contracts. | | |
| Compliance summary Not applicable | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 127 | Trading Licence Clause 19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(3)</i> A retailer or other party must ensure that a customer is able to contact the retailer or other party on the retailer's or other party's telephone number during the normal business hours of the retailer or other | | |

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| party for the purposes of enquiries, verifications and complaints. |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined contents of information pack. |
| Observations The information provided to customers includes information on how to contact the licensee during normal business hours including the telephone number. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item128 TradingLicenceClause19 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(1)</i> A gas marketing agent must, on request, provide the customer with it's and the retailer's complaints telephone number and marketing identification number. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer. | |
| Observations The licensee did not during the audit period receive any requests to provide the customer with it's and the retailer's complaints telephone number and marketing identification number however this information is available. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item129 TradingLicenceClause19 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(2)</i> A gas marketing agent who meets with a customer face to face must: as soon as practicable tell the customer the purpose of the visit ;wear a clearly visible and legible identity card showing the information specified; and as soon as practicable provide the information specified in writing to the customer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee does not visit customers therefore the above obligation does not apply. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item130 TradingLicenceClause19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(3)</i> A retailer or other party must keep the specified records each time it initiates contact with a customer for the purposes of marketing. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations 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 and the licensee only provides information to allow a gas supply to be made available by setting up the customer account. | |

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| Compliance summary |
| Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item131 TradingLicenceClause19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7</i> A person who carries out any marketing activity in the name of or for the benefit of a retailer or a gas marketing agent is to be taken to have been employed or authorised by the retailer or gas marketing agent, unless the contrary is proved. | |
| Verification/Tests | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations | |
| The only people that act on behalf of the licensee are the two employees based in Esperance. | |
| Compliance summary | |
| Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item132 TradingLicenceClause19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.8(1)</i> A gas marketing agent must: keep a record of each complaint made by a customer, or person contacted for the purposes of marketing, about the marketing carried out by or on behalf of the gas marketing agent; and on request by the gas ombudsman in relation to a particular complaint, give to the gas ombudsman all information that the gas marketing agent has relating to the complaint within 28 days of receiving the request. | |
| Verification/Tests | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations | |
| No complaints have been received during the audit period and no requests have been received from the gas ombudsman. A record is kept of the discussions with customers regarding becoming a gas user. | |
| Compliance summary | |
| Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item133 TradingLicenceClause19 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.8(2)</i> Any record that a gas marketing agent is required to keep by the Code of Conduct, must be kept for at least 2 years after the last time the person to whom the information relates was contacted by or on behalf of the gas marketing agent. | |
| Verification/Tests | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined records | |
| Observations | |
| All information is retained for at least 2 years after the last time the person to whom the information relates was contacted by or on behalf of the gas marketing agent. | |
| Compliance summary | |
| Compliant | |
| Corrective Action/Opportunity for Improvement | |

COMPENDIUM OF GAS CUSTOMER LICENCE OBLIGATIONS (COMPENDIUM)

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| Item134/145 | Trading Licence Clause 2.1 and Schedule 2 | Compliance rating Compliant -5 |
| <i>Energy Coordination Act section 11M</i> Compendium clause 3.1(1) 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | | |
| Observations As staff at Esperance represent both licensees this occurs automatically. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item135/146 | Trading Licence Clause19 clause 2.1 and Schedule 2 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Compendium clause 3.1(2) Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day; or the next business day, if the request is received after 3pm or on a weekend or public holiday. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined process for connecting new customers to the distribution system. | | |
| Observations As staff at Esperance represent both licensees this occurs automatically. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item136/147 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Compliant -5 |
| <i>Energy Coordination Act section 11M</i> Compendium clause 4.1(a) A retailer must issue a bill no more than once a month unless the conditions specified in subclause 4.1(a) (i) (ii) are met. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer bills | | |
| Observations The licensee issues a bill each month to business customers and every 3 months to residential customers. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item137 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> Compendium clause 4.1(b) A retailer must issue a bill at least every 3 months unless the conditions specified in subclause 4.1(b) (i) (iii) are met. | | |
| Verification/Tests | | |

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| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer bills |
| Observations The licensee only issues a bill to residential customers every 3 months and during the audit has not found it necessary to change the frequency. Therefore unable to rate this obligation as the conditions that trigger this obligation did not occur during the audit period. |
| Compliance summary not rated |
| Corrective Action/Opportunity for Improvement |

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| Item138 Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(1)</i> Prior to placing the customer on a shortened billing cycle, a retailer is considered to have given a customer notice if the retailer has advised the customer of the information specified in subclause 4.2(1)(a)-(d). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations No customers were placed on a shortened billing cycle during the audit period. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item139/148 Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(2)</i> A retailer must not place a residential customer on a shortened billing cycle without the customer's verifiable consent in circumstances specified in subclause 4.2(2)(a)-(b); | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations No customers were placed on a shortened billing cycle during the audit period | |
| Compliance summary Not rated. | |
| Corrective Action/Opportunity for Improvement . | |

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| Item140/149 Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(3)</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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations No customers were placed on a shortened billing cycle during the audit period | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 141/150 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(4)</i> A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations No customers were placed on a shortened billing cycle during the audit period | | |
| Compliance summary Not rated. | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 142/151 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(5)</i> Upon request, a retailer must return a customer who is subject to a shortened billing cycle and has paid 3 consecutive bills by the due date, to the billing cycle that previously applied to the customer. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations No customers were placed on a shortened billing cycle during the audit period | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item143/152 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.2(6)</i> At least once every 3 months, a retailer must inform a customer who is subject to a shortened billing cycle of the conditions upon which a customer can be returned to the customer's previous billing cycle. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations No customers were placed on a shortened billing cycle during the audit period | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item144/153 | Trading Licence clause 2.1 and Schedule 2 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M Compendium clause 4.3(1)</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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |

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| Observations |
| No bill smoothing arrangements occurred during the audit period |
| Compliance summary |
| Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item145/154 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer provides a customer with a bill under a bill smoothing arrangement, the retailer must ensure that the conditions specified in subclause 4.3(2)(a)-(e) are met. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations No bill smoothing arrangements occurred during the audit period | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item146/155 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations The licensee has complied with this obligation. | | |
| Compliance summary Compliant. | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item147/156 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1) (a)-(cc) on the customer's bill. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations The licensee has amended the bill to include the TTY service number and a bar graph but still needs to include the national interpreter symbol. The licensee was unable to include the TTY symbol in it's off the shelf current billing system but will be incorporating it on the bill when the new software package (ProjectSight) currently being developed in-house is implemented. | | |
| Compliance summary Non-compliant | | |
| Corrective Action/Opportunity for Improvement Include the national interpreter symbol on bill. | | |

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| Item148 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(2) | Compliance rating Compliant -5 |
| <i>Energy Coordination Act section 11M</i> A retailer is not obliged to include a graph or bar chart on the bill, if the bill is not indicative of the customer's actual consumption or based upon a meter reading. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined gas bills | | |
| Observations The licensee includes a bar graph on the customer's bill that is indicative of the customer's actual consumption or based upon a meter reading | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item149/157 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(3) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer identifies and wishes to bill a customer for an historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with or on the customer's next bill. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data base. | | |
| Observations The licensee has a process in place to comply with this obligation. However, during the audit period no customer was billed for historical debt. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item150/158 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(1) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must base a customer's bill on the distributor's or metering agent's reading of the meter at the customer's supply address, or the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(a)(b). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations All customer bills are based on metering agent's or following the retailer's request the customer's reading of the meter. The only exception is when the bill is estimated by the retailer. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item151/159 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Prior to a customer reading a meter, a retailer must give the customer information that explains how to read a meter correctly in clear, simple and concise language. | | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined information pack |
| Observations The licensee provides information to each customer in the information pack on how to read a gas meter. The information is also available on the licensee's website and can be provided by contacting the licensee directly. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item152/160 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(1) | 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations The metering information is obtained every month from business customers and every 3 months from residential customers to enable the bills to be prepared in accordance with the licensee's schedule. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item153 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must ensure that at least once every 12 months it obtains metering data in accordance with clause 4.6(1) (a). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations Several customers read their own meter and provide the readings to the licensee. At least once every 12 months the licensee makes arrangements with the customer for the meter to be read by their meter reader. Any adjustment to the bill then occurs. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item154/161 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(1) | Compliance rating Compliant-5 |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |

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| Observations |
| During the audit period customers were provided with estimated bills. |
| Compliance summary |
| Compliant |
| Corrective Action/Opportunity for Improvement |
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| Item155/162 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2) | Compliance rating Non-compliant-1 |
| <i>Energy Coordination Act section 11M</i> | | |
| In circumstances where the customer's bill is estimated, a retailer must specify in a visible and legible manner the information specified in subclause 4.8(2)(a)-(c). The customer may request a verification of a meter reading and a meter reading. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | | |
| Observations | | |
| During the audit period customers were provided with estimated bills and although the bill does not make any reference to the fact that it has been estimated a compliance slip is included stating the bill has been estimated. The licensee's current billing software does not allow for notifications of this type to be included as part of the bill. The new ProjectSight software under development by the licensee will provide this feature and allow the required information to be included when a bill is estimated. | | |
| Compliance summary | | |
| Non-compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Bill to include a reference to the fact that it is estimated and if requested by the customer the retailer will tell the customer the basis of the estimation and the reason for the estimation as required under clause 4.8 of the Compendium. | | |

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| Item156/163 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(3) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> | | |
| Upon request, a retailer must inform a customer of the basis and the reason for the estimation. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills and billing data records | | |
| Observations | | |
| During the audit period the licensee did not receive any request from a customer requiring information on the basis and the reason for the estimation. | | |
| Compliance summary | | |
| Not rated | | |
| Corrective Action/Opportunity for Improvement | | |
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| Item157/164 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.9 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> | | |
| If a retailer gives a customer an estimated bill, and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing records | | |
| Observations | | |
| Examination of a series of estimated bills showed that once the meter is read the bill is adjusted to reflect the | | |

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| actual use and cost. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item158/165 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.10 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer has based a bill upon an estimation because the customer failed to provide access to the meter, and the customer subsequently requests the retailer to provide a bill based on a reading of the meter and provides access to the meter, and pays the retailer's reasonable charge for reading the meter (if any), the retailer must do so. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period the above scenario did not occur. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item159/166 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a customer requests the meter to be tested and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined Licensee's documentation regarding meter testing | |
| Observations No request was received during the audit period. The licensee has information on meter testing included in the documentation provided to a customer as part of the welcome pack. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item160/167 Trading Licence clause 2.1 and Schedule 2 Compendium 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 distributor's reasonable charge for testing the meter (if any) is to be refunded to the customer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills | |
| Observations During the audit period no meter testing occurred. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item161/168 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1) | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> If a retailer offers alternative tariffs and a customer applies to receive an alternate tariff (and demonstrates to the retailer that they satisfy the conditions of eligibility), a retailer must change the customer to an alternate tariff within 10 business days of the customer satisfying those conditions. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined standard form contract Examined other information provided to customers and information provided on website | |
| Observations The licensee does not offer alternative tariffs. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item162 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(2) | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> For the purpose of subclause 4.12(1), the effective date of change in the tariff will be the date on which the last meter reading at the previous tariff was obtained; or, if the change requires an adjustment to the meter at the customer's supply address, the date the meter adjustment is completed. | |
| Verification/Tests Interviewed Business and Regulatory Manager Examined bills | |
| Observations The licensee does not offer alternative tariffs. As this obligation relates to alternative tariffs it is not applicable. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item163/169 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.13 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> If a customer's gas use changes and the customer is no longer eligible to continue to receive an existing, more beneficial tariff, a retailer must give the customer written notice prior to changing the customer to an alternative tariff. | |
| Verification/Tests Interviewed Customer Service Team Leader Examined bills Examined billing data records | |
| Observations The licensee only offers one tariff therefore this obligation does not apply. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item164/172 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(1) | Compliance rating Compliant-5 |
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| <i>Energy Coordination Act section 11M</i> If a customer requests a retailer to issue a final bill at the customer's supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer's request. | |
| Verification/Tests Interviewed Customer Service Team Leader Examined bills Examined billing data records | |
| Observations The licensee normally issues a final bill and posts it to the customer's supply address unless asked to post it to a different address. The bill states the supply address to which it applies. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item165/173 | Trading Licence clause 2.1 and Schedule 2 | Compendium | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If the customer's account is in credit at the time of account closure, the retailer must repay the amount to the customer. | | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | | |
| Observations The licensee at the time of account closure if the account is in credit refunds the credit. | | | |
| Compliance summary Compliant | | | |
| Corrective Action/Opportunity for Improvement | | | |

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| Item166/174 | Trading Licence clause 2.1 and Schedule 2 | Compendium clause 4.15 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> Subject to a customer – (a) paying – (i) that portion of the bill under review that the customer and a retailer agree is not in dispute; or (ii) an amount equal to the average amount of the customer's bills over the previous 12 months (excluding the bill in dispute), whichever is less; and (b) paying any future bills that are properly due, a retailer must review the customer's bill on request by the customer. a retailer must review the customer's bill on request by the customer. | | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | | |
| Observations No requests were received from customers during the audit period to review their bill. | | | |
| Compliance summary Not rated | | | |
| Corrective Action/Opportunity for Improvement | | | |

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| Item167/175 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(a) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer is satisfied after conducting a review of a bill that the bill is correct, the retailer may require a customer to pay the unpaid amount; must advise the customer that the customer may request the retailer to arrange a meter test in accordance with applicable law; and must advise the customer of the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations No requests were received from customers during the audit period to review their bill. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item168/175 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(b) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer is satisfied after conducting a review of a bill that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17 and 4.18. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations No requests were received from customers during the audit period to review their bill. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item169/176 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> The retailer must inform a customer of the outcome of the review (of the bill) as soon as practicable. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations No requests were received from customers during the audit period to review their bill. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item170 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(3) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If the retailer has not informed a customer of the outcome of the review within 20 business days from the date of receipt of the request for review under clause 4.15, the retailer must provide the customer with notification of the status of the review as soon as practicable. | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records |
| Observations No requests were received from customers during the audit period to review their bill. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item171/177 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.17(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer proposes to recover an amount undercharged as a result of an error, defect or default for which the retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must follow the procedure specified in subclauses 4.17.(2)(a)-(e). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period no undercharges occurred as a result of an error, defect or default for which the licensee was responsible (including where a meter has been found to be defective). | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item172/178 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a customer (including a customer who has vacated the supply address) has been overcharged as a result of an error, defect or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the error, defect or default and ask the customer for instructions as to whether the amount should be credited to the customer's account; or repaid to the customer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period no overcharges occurred as a result of an error, defect or default for which the licensee was responsible (including where a meter has been found to be defective). | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item173/179 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(3), 4.18(5) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer receives instructions under subclause 4.18(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to a credit or refund referred to in this subclause. | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records |
| Observations During the audit period no overcharges occurred as a result of an error, defect or default for which the licensee was responsible (including where a meter has been found to be defective). |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item174/180 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(4), 4.18(5) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.18(2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's account. No interest shall accrue to a credit or refund referred to in this subclause. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period no overcharges occurred as a result of an error, defect or default for which the licensee was responsible (including where a meter has been found to be defective). | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item175 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(6) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> Where the overcharged amount is less than \$75 the retailer may notify the customer of the overcharge by no later than the next bill after the retailer became aware of the error, and ask the customer for instructions in accordance with subclause 4.18(2); or credit the amount to the customer's account. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period no overcharges occurred as a result of an error, defect or default for which the licensee was responsible (including where a meter has been found to be defective). | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item176 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of the customer, the retailer must follow the procedure specified in subclause 4.19(1) (a)-(d). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |

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| Examined bills |
| Examined billing data records |
| Observations The above circumstance did not occur during the audit period. . |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item177 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(2) | Compliance Rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If after the meter reading a retailer becomes aware of an amount owing to the customer, the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the adjustment and, subject to subclause (5), ask the customer for instructions as to whether the amount should be credited to the customer's account; repaid to the customer; or included as a part of the new bill smoothing arrangement where the adjustment arises under clause 4.3(2)(a)-(b). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations If a customer has money owing the licensee contacts the customer and asks them how they would like the refund by direct deposit or cheque, arrangements are then made by the licensee for the refund to be actioned. During the audit period several customers were contacted and money refunded. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item178 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(3), 4.19(6) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If a retailer received instructions under subclause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to an adjustment amount. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations All overcharges are automatically refunded in accordance with the customer's wishes and within the required time frame. During the audit period several customers were contacted and money refunded | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item179 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(4), 4.19(6) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.19(2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account. No interest shall accrue to an adjustment amount. | |
| Verification/Tests | |

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| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records |
| Observations No instance of the above occurred during the audit period |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item180 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(5) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Where the adjustment amount owing to the customer is less than \$75, the retailer may notify the customer of the adjustment by no later than the next bill after the meter is read, and ask the customer for instructions in accordance with subclause 4.19(2); or credit the amount to the customer's account. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee contacts the customer to arrange a refund regardless of the amount. During the audit period this occurred on a number of occasions. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item181/181 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1 | Compliance rating Compliant-4 |
| <i>Energy Coordination Act section 11M</i> The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations After examining a number of bills that were issued during the audit period, the due date on the bill is always more than 12 business days from the date the bill was dispatched. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement Bill could be improved if it showed date on which it is dispatched. Shows reading date and due date. | |

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| Item182/182 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.2 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must offer a customer at least the following payment methods: in person at 1 or more payment outlets located within the Local Government District of the customer's supply address; by mail; for residential customers, by Centerpay; and either electronically or by telephone by means of a debit facility or a credit card. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |

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| Examined How To Pay Your Gas Account Brochure Examined billing data records |
| Observations All the payment methods specified above are accepted by the licensee. |
| Compliance summary Compliant. |
| Corrective Action/Opportunity for Improvement |

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| Item183/184 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.3 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> Prior to commencing a direct debit, a retailer must obtain the customer's verifiable consent and agree with the customer, wherever possible, on the amount to be debited, and the date and frequency of the direct debit. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined How To Pay Your Gas Account Brochure. | |
| Observations The licensee does not provide a direct debit facility. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item184/185 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.4 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must accept payment in advance from a customer on request. Acceptance of an advance payment will not require a retailer to credit any interest to the amounts paid in advance. The minimum amount for which a retailer will accept an advance payment is \$20. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee accepts payment in advance if requested by a customer. The payment in advance minimum amount is \$20 and the retailer does not credit any interest to the amounts paid in advance. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item185/186 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.5 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a customer is unable to pay by way of the methods described in clause 5.2, due to illness or absence, a retailer must offer a residential customer a redirection of the customer's bill to a third person, at no charge. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee has a process in place to comply with this obligation but during the audit period this situation did | |

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| not occur. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item186/187 Trading Licence clause 2.1 and Schedule 2 Compendium 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 in subclause 5.6(1) (a)-(d). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee does not charge a residential customer a late payment fee if any of the circumstances specified in subclause 5.6(1) (a)-(d) of the Compendium exist. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item187/188 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If a retailer has charged a residential customer a late fee, a retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations No late payment fees have been charged other than in accordance with the above requirements. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item188/189 Trading Licence clause 2.1 and Schedule 2 Compendium 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 3 late payment fees in relation to the same bill, and 12 late payment fees in a year. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations Only one late payment fee is charged and this is specified on next bill. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item189/190 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(4) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If a residential customer has been assessed by a retailer as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to the residential customer's last bill prior to the assessment being made. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | |
| Observations The licensee has a process in place to ensure compliance with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Item190/191 | Trading Licence clause 2.1 and Schedule 2 Compendium 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, and who has given the retailer notice, to pay for gas consumed at the customer's supply address in the circumstances specified in subclause 5.7(1). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | |
| Observations During the audit period customers who have vacated a supply address 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 and the circumstances specified in subclause 5.7(1) are complied with. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Item191/192 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate a supply address, a retailer must not require a customer to pay for gas consumed at the customer's supply address from the date the customer gave the retailer notice. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations 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. The licensee has a process in place to deal with this event. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item192 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(3) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Notice is given if a customer informs a retailer of the date on which the customer intends to vacate, or has vacated the supply address, and gives the retailer a forwarding address to which a final bill may be sent. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations During the audit period the licensee has complied with the above obligation and sent the final bill to the forwarding address. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item193/193 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(4) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a retailer and a customer enter into a new contract for the supply address, a retailer must not require the previous customer to pay for gas consumed at the customer's supply address from the date the new contract becomes effective and in circumstances specified in subclause 5.7(4). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| 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 is the only retailer the obligation relating to a previous retailer does not apply. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item194/194 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must comply with the Conduct Principles set out in the debt collection guideline issued by the Australian Competition and Consumer Commission concerning section 50 of the Australian Consumer Law (WA). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations No proceedings for recovery of debt occurred during the audit period as the licensee does not have a debt collection policy. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item195/195 | Trading Licence clause 2.1 and Schedule 2 Compendium 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 from a residential customer who has informed a retailer that the customer is experiencing payment difficulties or financial hardship; or while a residential customer continues to make payments under an alternative payment arrangement. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations No proceedings for recovery of debt occurred during the audit period. The licensee does not have a debt recovery process. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item196/196 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | |
| Observations No proceedings for recovery of debt occurred during the audit period. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item197/197 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.9 | Compliance rating Not applicable |
| <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 in subclause 5.9. | | |
| Verification/Tests | | |
| Observations No dual contracts or separate contracts for the supply of electricity and gas exist. The licensee only supplies natural gas. | | |
| Compliance summary Not applicable | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item198/198 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(1) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> | | |

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| A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within 3 business days from when the residential customer informs a retailer that the customer is experiencing payment problems. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations 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. Other than the hardship policy the licensee does not have any other documented policy on how to undertake an assessment. During the audit period assessments have been carried out within the required timeframe and the licensee uses every endeavour to try and assist a customer who is experiencing payment difficulties or financial hardship to resolve the matter. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item199/199 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> When undertaking an assessment regarding payment difficulties or financial hardship, a retailer must give reasonable consideration to the information given by the residential customer and requested or held by the retailer; or advice given by an independent financial counsellor or relevant consumer representative organisation | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations The licensee if contacted by a customer who is having trouble paying their bill always accepts that the customer is experiencing difficulty and works with the customer or the relevant organisation representing the customer to find a solution that is acceptable to both parties. However, apart from the hardship policy no other documented process exists that the licensee follows. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 200/200 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(3) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must advise a residential customer on request of the details of an assessment. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations There have been no requests from a customer for details of an assessment. Details of the assessment would be provided on request. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 201/201 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(1) | Compliance rating Not rated |
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| <i>Energy Coordination Act section 11M</i> A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions, if the customer demonstrates to the retailer that the customer has an appointment with a relevant consumer representative organisation to assess the customer's capacity to pay. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined billing data records | |
| Observations There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 202/202 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined billing data records | | |
| Observations There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 203/203 | Trading Licence clause 2.1 and Schedule Compendium 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 or relevant consumer representative organisation in the manner specified to allow a relevant consumer representative organisation additional time to assess a residential customer's capacity to pay. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 204/204 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1) | Compliance rating Compliant-4 |
| <i>Energy Coordination Act section 11M</i> If the assessment carried out under clause 6.1 indicates to the retailer that the residential customer is experiencing payment difficulties or financial hardship, the retailer must follow the procedure specified in subclause 6.3(1). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |

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| Examined bills Examined billing data records |
| Observations 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. Currently 66 customers are on a Centerpay arrangement. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement Although the licensee complies with this obligation no documented process for staff to follow exists. Consideration to be given to documenting the process to be followed including a check list that needs to be completed for record purposes. |

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| Item 205/205 Trading Licence clause 2.1 and Schedule 2 Compendium 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 payment arrangements that are specified in subclause 6.4(1). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee offers the customer additional time to pay and fee free and interest free instalment plans. Currently the licensee has 10 customers subject to payment arrangements. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 206/206 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> When offering an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must take into account the information and take the specified actions detailed in subclause 6.4(2). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee when offering an instalment plan complies with the requirements of clause 6.4(2) of the Compendium | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 207 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(3) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> If a residential customer has in the previous 12 months had 2 instalment plans cancelled due to non-payment, a retailer does not have to offer that residential customer another instalment plan, unless the retailer is satisfied that the residential customer will comply with the proposed plan. | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations None of the above occurred during the audit period. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 208/207 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations No requests of this nature where received during the audit period | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 209/208 | Trading Licence clause 2.1 and Schedule 2 Compendium 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). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined hardship policy | | |
| Observations The licensee has a hardship policy that complies with clause 6.10(2)(d) of the Compendium 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. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 210/209 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.7 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Where it is reasonably demonstrated to the retailer that the customer, experiencing financial hardship, is unable to meet the customer's obligations under the previously elected payment arrangement, a retailer must give reasonable consideration to offering the customer an instalment plan or offering to revise an existing instalment plan. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | |
| Observations | | |

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| The licensee currently has 10 customers subject to an instalment plan and 66 subject to a Centerpay arrangement. During the audit period no requests have been received from customers regarding a review of their existing payment option. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 211/210 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.8 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must advise a customer experiencing financial hardship of the options specified in subclause 6.8. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations 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. The warning and disconnection notice also contains the same statement. During the audit period customers experiencing financial hardship have been advised by telephone about their options. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 212 /211 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(1) | Compliance rating Compliant-5 |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | |
| Observations The licensee works with the relevant consumer representative organisations to determine the minimum payment. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 213/212 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(2) | Compliance rating Compliant-5 |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records Examined copy of the hardship policy | |

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| Observations |
| The licensee accepts payment in advance amounts for residential customers experiencing payment difficulties or financial hardship and other customers and the minimum amount can differ. |
| Compliance summary |
| Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 214 /213 Trading Licence clause 2.1 and Schedule 2 Compendium 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 experiencing financial hardship in meeting their financial obligations and responsibilities to the retailer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined copy of the hardship policy | |
| Observations Hardship policy has been implemented and is subject to regular review. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 215/214 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations 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. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 216/215 Trading Licence clause 2.1 and Schedule 2 Compendium 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 retailer's hardship policy, at no charge. The retailer must provide all residential customers identified as experiencing financial hardship with details of its hardship policy. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee includes a copy of its hardship policy to all new customers as part of the information pack. Financial counsellors and relevant consumer representative organisations have also been provided with a copy at no charge. The licensee also provides all residential customers identified as experiencing financial hardship with details of its hardship policy. | |
| Compliance summary Compliant | |

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| Corrective Action/Opportunity for Improvement | | |
| Item 217/216 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(4) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the following: the relevant consumer representative organisations consulted on the contents of its hardship policy; the date the hardship policy was established; the dates the hardship policy was reviewed; and the dates the hardship policy was amended | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined records | | |
| Observations The licensee keeps all the above records. The last review of the hardship policy was completed on 13/5/2013. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 218/217 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(5) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> Unless otherwise notified in writing by the Authority, a retailer must review its hardship policy at least annually and submit to the Authority the results of that review within 5 business days of its completion. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations The policy was reviewed each year covered by the audit with the last review being completed earlier this year. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 219 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(6) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> The retailer may, at any time, review its hardship policy and submit to the Authority the results of that review within 5 business days after it is completed | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations The policy was reviewed earlier this year at the request of the Authority. As the Authority requested the review the obligation could not be tested. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 220/218 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined hardship policy | |
| Observations The licensee followed the Authority's Financial Hardship Policy Guidelines when they last updated their hardship policy earlier this year. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 221/219 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills Examined billing data records | | |
| Observations During the audit period no business customer contacted the licensee to request alternative payment arrangements because they were experiencing payment difficulties. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 222/220 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1 | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> A retailer must follow the procedures specified in subclause 7.1(1) prior to arranging for disconnection of a customer's supply address for failure to pay a bill. A customer has failed to pay a bill in the circumstances specified in subclause 7.1(2). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined disconnection process | | |
| Observations The licensee provides the customer with a reminder notice that includes the licensee's telephone number, advice how the licensee may assist the customer if they are experiencing payment difficulties or financial hardship and giving the customer time to pay. If the bill remains unpaid the licensee will then endeavour to contact the customer by telephone or electronic means and if the matter cannot be resolved this is followed by a final notice of disconnection. Neither of the letters contain information on the complaints handling process of the licensee. | | |
| Compliance summary Not-compliant | | |
| Corrective Action/Opportunity for Improvement Licensee to include information on disconnection correspondence that it has a complaints handling process and how it operates. | | |

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| Item 223/221 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.2(1) | Compliance rating Compliant-5 |
| <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 | | |

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| circumstances specified in subclause 7.2(1). |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined disconnection process |
| Observations The licensee is aware of the above requirements and ensures compliance with the flow chart it has established to cover the disconnection process. During the audit period disconnections occurred for non-payment but the limitations on disconnection for failure to pay the bill specified in clause 7.2 (1) of the Compendium did not occur. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 224/222 Trading Licence clause 2.1 and Schedule 2 Compendium 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 electricity supply. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee does not have dual fuel contracts or separate contracts for the supply of electricity and the supply of gas | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item 225/223 Trading Licence clause 2.1 and Schedule 2 Compendium 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 in subclause 7.4(1) are satisfied. A retailer may arrange for a distributor to carry out 1 or more of the requirements referred to in subclause 7.4(1) on behalf of the retailer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined disconnection process | |
| Observations During the audit period such a situation did not occur. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 227/225 Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.6 | Compliance rating Compliant-5 |
| <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 in clause 7.6. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |

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| Examined disconnection process |
| Observations During the audit period disconnections occurred and as they were instigated by the licensee the limitations relating to timing and day of disconnection were complied with. |
| Compliance summary Compliant-5 |
| Corrective Action/Opportunity for Improvement |

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| Item 228/226 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> In the circumstances specified in clause 8.1(1)(a)-(c), a retailer must arrange for reconnection of the customer's supply address if the customer makes a request for reconnection, and pays the retailer's reasonable charges for reconnection (if any) or accepts an offer of an instalment plan for the retailer's reasonable charges for reconnection. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations . During the audit period such a situation did not occur | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 229/227 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must forward the request for reconnection to the relevant distributor that same business day if the request is received before 3pm on a business day; or no later than the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations As the staff are common to both licensees this occurs automatically. During the audit period several reconnections occurred and they complied with the above obligation. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 231/229 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(1) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must give notice to each of its customers affected by a variation in its tariffs as soon as practicable after the variation is published and no later than the next bill in the customer's billing cycle. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations The licensee includes a note on all bills about the tariff change when the change occurs. | | |
| Compliance summary Compliant | | |

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| Corrective Action/Opportunity for Improvement | | |
| Item 232/230 | Trading Licence clause 2.1 and Schedule 2 Compendium 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 any alternative tariffs that may be available to the customer. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations No request for information on the tariff received from a customer during the audit period. The information is available for a customer at no cost if requested. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 233/231 | Trading Licence clause 2.1 and Schedule 2 Compendium 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 within 8 business days of the date of receipt of the request and, if requested, a retailer must provide the information in writing. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations No request for information on tariffs received from a customer during the audit period. The information is available for a customer if requested. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 234/232 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must, on request, give a customer their billing data. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations No request for billing data received from a customer during the audit period. The information is available for a customer if requested. | | |
| Compliance summary Not rated | | |
| Corrective Action/Opportunity for Improvement | | |
| Item 235/233 | Trading Licence clause 2.1 and Schedule 2 Compendium 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 if a customer requests their billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with the retailer. | | |

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| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations The Licensee has not had a request to provide billing data during the audit period The information is available for a customer if requested. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item 236/234 Trading Licence clause 2.1 and Schedule 2 Compendium 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 date of receipt of either the request, or payment of the retailer's reasonable charge for providing the billing data. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The Licensee has not had a request to provide billing data during the audit period. The information is available for a customer if requested.. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 237/235 Trading Licence clause 2.1 and Schedule 2 Compendium 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 7 years. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined billing data records | |
| Observations The licensee has retained on record all billing data since it commenced supplying gas in 2005. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 238/236 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.3 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> A retailer must give a residential customer on request, at no charge, information on the types of concessions available to the customer, and the names and contact details of the organisation responsible for administering those concessions (if not the retailer). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee does not offer any concessions. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item 239/237 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4 | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, general information on (including referring a customer to a relevant information source); how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee has a publication that is available to customers on general energy efficiency information. However, it does not contain information on how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. | |
| Compliance summary Non-compliant | |
| Corrective Action/Opportunity for Improvement Licensee to amend its publication on energy efficiency to include how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances. | |

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| Item 240/238 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> If a customer asks for information relating to the distribution of gas, a retailer must give the information to the customer or refer the customer to the relevant distributor for a response. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations As the staff are common to both licensees if a customer asks for information relating to the distribution of gas, the customer is provided with the information by the distributor. Requests for information of this type during the audit period were provided by the distributor. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 241/239 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(1) | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> The retailer must, within 3 months of being subject to the Compendium, lodge with the Authority, a gas customer safety awareness programme. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee has prior to the Compendium being released lodged its gas customer safety awareness programme with the Authority. As the gas customer safety awareness programme was lodged before the Compendium was released advice from the Authority is that this obligation does not apply. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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| Item 242 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(2) | Compliance rating not applicable |
| <i>Energy Coordination Act section 11M</i> | | |
| The retailer must consult with the Authority when preparing the gas customer safety awareness programme. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations | | |
| I understand that the licensee consulted with the Authority regarding its gas customer safety awareness programme at the time it was lodged but as it was lodged prior to the Compendium being released advice from the Authority is that this obligation does not apply. | | |
| Compliance summary | | |
| Not applicable | | |
| Corrective Action/Opportunity for Improvement | | |
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| Item 243 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(3) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> | | |
| The gas customer safety awareness programme is to communicate information to customers regarding safety in the use of gas and must address, at a minimum, the information referred to in clause 10.5 A (3) (a)-(e). | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined gas customer safety awareness programme documentation. | | |
| Observations | | |
| The gas customer safety awareness programme contains the above information. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
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| Item 245/241 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.9 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> | | |
| A retailer and distributor must, to the extent practicable, ensure that any written information that must be given to a customer by the retailer, distributor or gas marketing agent under the Gas Marketing Code and the Compendium is expressed in clear, simple and concise language and is in a format that makes it easy to understand. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined samples of written documentation provided to customers. | | |
| Observations | | |
| All written information provided by the licensee under the Gas Marketing Code and the Compendium is expressed in clear, simple and concise language and is in a format that makes it easy to understand. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |
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| Item 246/242 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> | | |

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| A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Gas Marketing Code and the Compendium. |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations . No requests of this nature received during the audit period. The information is available for a customer if requested. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item 247/243 Trading Licence clause 2.1 and Schedule 2 2 Compendium 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 Marketing Code and the Compendium available, at no charge, on their website. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined website | |
| Observations The Gas Marketing Code and the Compendium are posted on the licensee's website and copies can be downloaded at no cost. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 248/244 Trading Licence clause 2.1 and Schedule 2 Compendium 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 Marketing Code and the Compendium available for inspection, at no charge, at their offices. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations Copies of the Gas Marketing Code and the Compendium are available for inspection, at no charge, at the licensee's office. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 249/245 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(1) | Compliance rating Not rated |
| <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 (including independent multi-lingual and TTY services, and large print copies). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |

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| Observations | |
| The licensee is aware of the need to 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 (including independent multi-lingual and TTY services, and large print copies). However, during the audit period no request of this type was made. | |
| Compliance summary | |
| Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 250/246 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2) | Compliance rating Non-compliant-2 |
| <i>Energy Coordination Act section 11M</i> | | |
| A retailer and, where appropriate, a distributor must include on a residential customer's bill and bill related information, reminder notice and disconnection warning: the telephone number for their TTY services; the telephone number for independent multi-lingual services; the National Interpreter Symbol with the words "Interpreter Services". | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations | | |
| Examined above documentation. All the information is provided with the exception of the National Interpreter Symbol. The licensee's current billing software does not allow for notifications of this type to be included as part of the bill and on other documentation. The new ProjectSight software under development by the licensee will provide this feature and allow the required information to be included. | | |
| Compliance summary | | |
| Non-compliant | | |
| Corrective Action/Opportunity for Improvement | | |
| Licensee to include the National Interpreter Symbol on a residential customer's bill and bill related information, reminder notice and disconnection warning. | | |

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| Item 251/247 | Trading Licence clause 2.1 and Schedule 2 Compendium 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. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaint handling process. | | |
| Observations | | |
| The licensee has a process in place to handle complaints and resolve disputes. As no complaints were received during the audit period it was not possible to test the effectiveness of the process. | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 252/248 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(a) and (b) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> | | |
| The complaints handling process must comply with AS ISO 10002 – 2006 and address, at the least, the criteria specified in clause 10.2(b). | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |

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| Examined complaint handling process. |
| Observations The complaints handling process complies with AS ISO 10002 – 2006 and addresses the criteria specified in clause 10.2(b) of the Compendium. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 253 Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(c) and (d) | Compliance rating Compliant -5 |
| <i>Energy Coordination Act section 11M</i> The complaints handling process must detail how the retailer will handle complaints about a retailer or marketing, and be available at no cost to customers. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints handling process document. | |
| Observations The complaints handling process contains information on how the retailer will handle complaints about a retailer or marketing, and be available at no cost to customers. | |
| Compliance summary Compliant -5 | |
| Corrective Action/Opportunity for Improvement | |

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| Item 254 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer or distributor must advise the customer that the customer has the right to have the complaint considered by a senior employee within the retailer or distributor, when responding to a customer complaint. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints process document | | |
| Observations The process provides for advising the customer that the customer has the right to have the complaint considered by a senior employee within the retailer or distributor, when responding to a customer complaint. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 255 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> | | |
| When a complaint has not been resolved internally in a manner acceptable to the customer, a retailer or distributor must advise the customer of the reasons for the outcome (on request, the retailer or distributor must supply such reasons in writing); and that the customer has the right to raise the complaint with the gas ombudsman or another relevant external dispute resolution body and provide the Free call telephone number of the gas ombudsman. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Observations | | |
| No complaints were received during the audit period. | | |
| Compliance summary | | |

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| Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item 256/250 Trading Licence clause 2.1 and Schedule 2 Compendium 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints process | |
| Observations The licensee complies with all guidelines developed and issued by the Authority. The above guideline was complied with by the licensee when developing the complaints process. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 257/251 Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer, distributor and gas marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined document that sets out complaints process. | |
| Observations The complaints process provides for information that will assist the customer in utilising the respective complaints handling processes to be provided on request. However during the audit period no requests for information on the complaints handling processes were received. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 258/252 Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.4 | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> When a retailer, distributor or gas marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No complaints were received during the audit period. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 259/253 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(1) | Compliance rating Compliant-5 |
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| <i>Energy Coordination Act section 11M</i> Unless expressly provided otherwise, a retailer, distributor or gas marketing agent must keep a record or other information as required to be kept by the Code of Conduct and the Compendium for at least 2 years from the last date on which the information was recorded. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined records | |
| Observations All relevant information is retained for at least the required period. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item 260 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> For the purposes of clause 13.1(1), a retailer must keep records or other information specified in clause 13.1(2) (a)-(g) | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined records and reports | | |
| Observations Examination of the customer records and reports confirmed that the licensee complies with the above requirements. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 262/254 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(a)(i)-(xv) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number and percentage of its residential customer accounts under the affordability and access indicators specified in clause 13.2(a)(i)-(xv). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined records and reports | | |
| Observations Examination of the customer records and reports confirmed that the licensee complies with the above requirements. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 263/256 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(b)(i)-(ix) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number and percentage of its business customer accounts under the affordability and access indicators specified in clause 13.2(b)(i)-(ix). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer records and reports | | |
| Observations | | |

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| Examination of the customer records and reports confirmed that the licensee complies with the above requirements. |
| Compliance summary Compliant |
| Corrective Action/Opportunity for Improvement |

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| Item 264 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(c) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the actions it undertook, and the responses from the distributor to those actions, to obtain metering data where the retailer has issued a bill outside of the time frame set out in clause 4.1(b). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined bills and records | |
| Observations Examination of bills and available records confirmed that the retailer has not issued a bill outside of the time frame set out in clause 4.1(b). | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 265 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(1) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number of complaints received from residential and business customers, as well as keeping a record of the complaint indicators specified in clause 13.3(1)(b)-(f). | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints records | |
| Observations During the audit period the licensee did not receive any complaints. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 266 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(2) | Compliance rating Not rated |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the details of each complaint referred to in clause 13.3(1) | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints records | |
| Observations During the audit period the licensee did not receive any complaints. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item 267/257 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.5 | Compliance rating Not applicable |
| <i>Energy Coordination Act section 11M</i> A retailer must keep a record of the call centre performance indicators specified in clause 13.5(a)-(e). | |

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| Verification/Tests |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations |
| The licensee does not have a call centre so the above records are not kept. |
| Compliance summary |
| Not applicable |

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| Item 268/258 | Trading Licence clause 2.1 and Schedule 2 Compendium 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 accounts held by customers and business customer accounts held by customers. A retailer must keep a record of the total number of residential and business accounts specified. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer database | | |
| Observations The licensee keeps a record of the total number of residential accounts held by customers and business customer accounts held by customers. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 275/265 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.15 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer must prepare a report in respect of each reporting year setting out the information in the records specified in clause 13.15(a)-(d). | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined annual performance report submitted by licensee | | |
| Observations The licensee prepared the above report setting out the information in the records specified in clause 13.15(a)-(d). | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 277 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> The annual retailer and distributor reports specified in clauses 13.15 and 13.16 are to be published not later than the following October 1. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined the website | | |
| Observations All reports during the audit period were published within the required time frame. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 278 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(2) | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A report is published for the purposes of b clause 13.17(1) if copies of it are available to the public, without cost, at places where the retailer or distributor transacts business with the public, and a copy of it is posted on a website maintained by the retailer or distributor. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined the website | | |
| Observations Reports are available on the website and from the licensee's office in Esperance. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 279/266 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13. 17(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. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined annual performance report submitted by licensee | | |
| Observations All reports during the audit period were provided to the Minister within the required time frame before being published. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

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| Item 280 | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.18 | Compliance rating Compliant-5 |
| <i>Energy Coordination Act section 11M</i> A retailer and distributor must provide the information in the records in clauses 13.15 and 13.16 to the Authority in a format acceptable to the Authority no later than the following 23 September. | | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined annual performance report submitted by license | | |
| Observations During the audit period all required information was provided within the required time frame. | | |
| Compliance summary Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

2010 GAS COMPLIANCE MANUAL OBLIGATIONS
GAS MARKETING CODE OF CONDUCT

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| Item 124 | TradingLicenceClause19 | Compliance rating |
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| | Not applicable |
| <p><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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | |
| <p>Observations No door to door marketing was undertaken by the licensee during the audit period. However, as part of the process of setting up a new customer the specified information is provided.</p> | |
| <p>Compliance summary Not applicable</p> | |
| <p>Corrective Action/Opportunity for Improvement</p> | |

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| Item 125 | Trading Licence Clause19 | Compliance rating Compliant-5 |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | | |
| <p>Observations The licensee does not market gas 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 licensee complies with the above obligation.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item126 | TradingLicenceClause19 | Compliance rating Compliant-5 |
| <p><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.</p> | | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | | |
| <p>Observations The licensee does not actively engage in marketing 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 licensee complies with the above obligation.</p> | | |
| <p>Compliance summary Compliant</p> | | |
| <p>Corrective Action/Opportunity for Improvement</p> | | |

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| Item127 | TradingLicenceClause19 | Compliance rating Not rated |
| <p><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</p> | | |

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| and any prices that exclude concessions are disclosed. |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations No concessions are offered by the licensee. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item128 TradingLicenceClause19 | Compliance rating Not rated |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined information pack | |
| Observations The licensee does not engage in door to door marketing. Therefore unable to rate this obligation. | |
| Compliance summary not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item129 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The information provided to a potential customer includes contact details of the licensee.. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item130 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations 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. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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| Item131 TradingLicenceClause19 | Compliance rating Not rated |
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| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations If requested the licensee would provide this information. However, during the audit period no request for such information was made. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item132 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: as soon as practicable tell the customer the purpose of the visit; wear a clearly visible and legible identity card showing the information specified; and as soon as practicable provide the information specified in writing to the customer. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No marketing has been performed face to face during the audit period. The practice of the licensee is not to meet the customer face to face to conduct any marketing activities. | |
| Compliance summary Not rated. | |
| Corrective Action/Opportunity for Improvement | |

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| Item133 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations 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. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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| Item134 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations All contact during the audit period has been within the permitted call times. | |
| Compliance summary Compliant | |

| Corrective Action/Opportunity for Improvement | |
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| Item135 TradingLicenceClause19 | Compliance rating Compliant-5 |
| <p><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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | |
| <p>Observations All contact has been in accordance with the above requirements.</p> | |
| <p>Compliance summary Compliant</p> | |
| Corrective Action/Opportunity for Improvement | |
| Item136 TradingLicenceClause19 | Compliance rating Compliant -5 |
| <p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(7) & 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.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | |
| <p>Observations 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.</p> | |
| <p>Compliance summary Compliant</p> | |
| Corrective Action/Opportunity for Improvement | |
| Item137 TradingLicenceClause19 | Compliance rating Not rated |
| <p><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: the customer requests contact; or the customer has moved premises; or a marketer has a legal obligation to contact the customer.</p> | |
| <p>Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer</p> | |
| <p>Observations No customer has during the audit period made the above request if such a request was ever to be made by a customer the licensee would comply with the above obligation.</p> | |
| <p>Compliance summary Not rated</p> | |
| Corrective Action/Opportunity for Improvement | |
| Item138 Trading Licence Clause19 | Compliance rating Not rated |
| <p><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> | |
| Verification/Tests | |

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| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer |
| Observations No customer has during the audit period made the above request if such a request was ever to be made by a customer the licensee would comply with the above obligation. |
| Compliance summary Not rated |
| Corrective Action/Opportunity for Improvement |

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| Item139 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations As it was not necessary to record any of this type of information during the audit period no copies were requested by the Gas Ombudsman or the Authority. | |
| Compliance summary Not rated. | |
| Corrective Action/Opportunity for Improvement . | |

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| Item140 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No customer has during the audit period made the above request if such a request was ever to be made by a customer the licensee would comply with the above obligation. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement Training should include reference to this obligation and the process to be followed to ensure compliance. | |

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| Item 141 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No direct door to door marketing has been performed during the audit period therefore this obligation has not occurred. | |
| Compliance summary Not rated. | |
| Corrective Action/Opportunity for Improvement | |

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| Item 142 TradingLicenceClause19 | Compliance rating Compliant-5 |
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| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer records | |
| Observations The licensee is aware of 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, complies with the requirements. Examination of records confirmed no complaints were received during the audit period in relation to breaches of the Privacy Act. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

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|--|--------------------------------|
| Item143 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No complaints of the above type were made during the audit period. If a complaint was received the licensee would comply with the above requirements. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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|---|----------------------------------|
| Item144 Trading Licence Clause19 | Compliance rating Compliant-5 |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee is aware of the information it needs to keep under the code if it engages in marketing and all records are kept indefinitely. | |
| Compliance summary Compliant | |
| Corrective Action/Opportunity for Improvement | |

LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

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|--|-------------------------------------|
| Item169 Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.13 | Compliance rating Not applicable |
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| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations No alternative tariffs are offered | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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|--|--------------------------------|
| Item170 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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined customer bills | |
| Observations No amounts were undercharged during the audit period and as a customer's meter is read every 3 months, this situation is unlikely to occur. | |
| Compliance summary Not rated | |
| Corrective Action/Opportunity for Improvement | |

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|--|-------------------------------------|
| Item183 Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(2) | Compliance rating Not applicable |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | |
| Observations The licensee does not accept electronic payments. | |
| Compliance summary Not applicable | |
| Corrective Action/Opportunity for Improvement | |

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|---|--------------------------------|
| Item 249 Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(3) | Compliance rating Not rated |
| <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. | |
| Verification/Tests Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer Examined complaints manual | |
| Observations 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. However, as no complaints received during audit period unable | |

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| to rate. |
| Compliance summary |
| Not rated |
| Corrective Action/Opportunity for Improvement |

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|---|--|-------------------|
| Item 255 | Trading Licence clause 2.1 and Schedule 2 Gas Customer | Compliance rating |
| | Code clause 13.3(1) | Compliant - 5 |
| <i>Energy Coordination Act section 11M</i> | | |
| A retailer must keep a record of the customer complaint indicators specified. | | |
| Verification/Tests | | |
| Interviewed Business and Regulatory Manager, Esperance Area Manager and Business Services Officer | | |
| Examined complaints database | | |
| Observations | | |
| No complaints received during the audit period. | | |
| Records kept even if number zero | | |
| Compliance summary | | |
| Compliant | | |
| Corrective Action/Opportunity for Improvement | | |

APPENDIX 2 COMPLIANCE SUMMARY

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-----------------------------|--------------|------------|---------------|-------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 1/1 | Energy Coordination Act section 11Q(1-2) | Trading Licence clause 4.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 2/2 | Energy Coordination Act section 11WG(1) | Trading Licence clause 12.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 3/3 | Energy Coordination Act section 11WG(2) | Trading Licence clause 13.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 4/4 | Energy Coordination Act section 11WK(1-2) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 5/5 | Energy Coordination Act section 11WK(3) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-----------------------------|--------------|------------|---------------|-------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 6/6 | Energy Coordination Act section 11X(3) | Trading Licence clause 5.1, | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 10/10 | Energy Coordination Act section 11ZA(1) | Trading Licence clause 16.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 17/17 | Energy Coordination Act section 11ZK(3) | Trading Licence clause 5.1, | Minor | Unlikely | Low | Moderate | 5 | | | | | | ✓ | |
| 24/24 | Energy Coordination Act section 11ZQH | Trading Licence clause 18.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

LICENCE COMPLIANCE REQUIREMENTS – GAS STANDARDS ACT 1972

| 2013/10 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 |
|------------------------------------|--|--------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 25/25 | Energy Coordination Act section 11Z | Trading Licence clause 5.1, | Major | Unlikely | High | Strong | 2 | | | | | ✓ | | |

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

| | | | | | | | | | | | | | | |
|-------|--|-------------------------------|-------|----------|-----|----------|---|--|--|--|--|---|--|--|
| 32/32 | Energy Coordination (Customer Contracts) Reg 12 (2) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 33/33 | Energy Coordination (Customer Contracts) Reg 12 (4)(a) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 34/34 | Energy Coordination (Customer Contracts) Reg 12 (4)(b) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 35/35 | Energy Coordination (Customer Contracts) Reg 12 (5)(a) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 36/36 | Energy Coordination (Customer Contracts) Reg 12 (5)(b) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 37/37 | Energy Coordination (Customer Contracts) Reg 12 (5)(c) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 38/38 | Energy Coordination (Customer Contracts) Reg 12 (5)(d) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 39/39 | Energy Coordination (Customer Contracts) Reg 12 (5)(e) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 40/40 | Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 41/41 | Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 42/42 | 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 | | | | | | | ✓ |
| 43/43 | 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 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 44/44 | 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 | | | | | | | ✓ |
| 45/45 | 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 | | | | | | ✓ | |
| 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 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 47/47 | 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 | | | | | ✓ | | |
| 48/48 | 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 | | | | | | | ✓ |
| 49/49 | 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 | | | | | | ✓ | |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 50/50 | 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 | | | | | | | ✓ |
| 51/51 | 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 | | | | | ✓ | | |
| 52/52 | Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 53/53 | Energy Coordination (Customer Contracts) Reg 13 (1), Clause 4.4.6.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 54/54 | Energy Coordination (Customer Contracts) Reg 13 (3) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 55/55 | Energy Coordination (Customer Contracts) Reg 13 (4) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 56/56 | Energy Coordination (Customer Contracts) Reg 14 (2), | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 57/57 | Energy Coordinatio n (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 | | | | | ✓ | | |
| 58/58 | Energy Coordinatio n (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code | Trading Licence clause 5.1 | Moderate | likely | High | Weak | 1 | | | | | ✓ | | |
| 59/59 | Energy Coordinatio n (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 60/60 | 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 | Moderate | Likely | High | Weak | 1 | | | | | ✓ | | |
| 61/61 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | ✓ | |
| 62/62 | Energy Coordination (Customer Contracts) Reg 15 (1) and (2) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | ✓ | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 63/63 | 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 | | | | | | | ✓ |
| 64/64 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 65/65 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 66/66 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 67/67 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|--------------------|----------|----------|---------|----------|----------|-----------|-----------|
| 68/68 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 69/69 | Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 70/70 | Energy Coordination (Customer Contracts) Reg 16 (3) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 71/71 | Energy Coordination (Customer Contracts) Reg 19 | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 72/72 | Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | ✓ | | | | |
| 73/73 | Energy Coordination (Customer Contracts) Reg 27 (4) and 40 (3) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 74/74 | Energy Coordination (Customer Contracts) Reg 20 (3) and 48 | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 75/75 | Energy Coordination (Customer Contracts) Reg 22 and 49 (2) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 76/76 | Energy Coordination (Customer Contracts) Reg 49 (3) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 77/77 | Energy Coordination (Customer Contracts) Reg 49 (4) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 78/78 | Energy Coordination (Customer Contracts) Reg 49 (5) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 79/79 | Energy Coordination (Customer Contracts) Reg 50 | Trading Licence clause 5.1 | Moderate | likely | High | Weak | 1 | | | | ✓ | | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|-------------------------------|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 80/80 | Energy Coordination (Customer Contracts) Reg 44 | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 81/81 | Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | ✓ | | | |
| 82/82 | Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2) | Trading Licence clause 5.1 | Moderate | Likely | High | Moderate | 2 | | ✓ | | | | | |
| 83/83 | Energy Coordination (Customer Contracts) Reg 46 (1) & (2) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|---|--------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 84/84 | Energy Coordination (Customer Contracts) Reg 46 (4) | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 85/85 | Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 86/86 | Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 90/90 | Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code | Trading Licence clause 5.1, | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|-------------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 91/91 | Energy Coordination (Customer Contract) Reg 42 | Trading Licence clause 5.1 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

| | | | | | | | | | | | | | | |
|-------|--|--------------------------------|----------|----------|--------|----------|---|--|--|--|--|--|---|---|
| 96/96 | Energy Coordination Act section 11M | Trading Licence clause 16.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 97/97 | Energy Coordination Act section 11M | Trading Licence clause 16.4 | Minor | Unlikely | Low | Moderate | 5 | | | | | | ✓ | |
| 98/98 | Energy Coordination Act section 11M | Trading Licence clause 17 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|-----------------------------|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 99/99 | Energy Coordinatio n Act section 11M | Trading Licence clause 20 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 100/100 | Energy Coordinatio n Act section 11M | Trading Licence clause 21.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 101/101 | Energy Coordinatio n Act section 11M | Trading Licence clause 22.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 102/102 | Energy Coordinatio n Act section 11M | Trading Licence clause 23.1 | Moderate | Likely | High | Weak | 1 | | | | | ✓ | | |
| 103/103 | Energy Coordinatio n Act section 11M | Trading Licence clause 24 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|--|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 106/106 | Energy Coordinatio n Act section 11M | Trading Licence clause 12.2 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 107/107 | Energy Coordinatio n Act section 11M | Trading Licence clause 12.3 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 108/108 | Energy Coordinatio n Act section 11M | Trading Licence clause 13.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 109/109 | Energy Coordinatio n Act section 11M | Trading Licence clause 15.1 and 15.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 110/110 | Energy Coordinatio n Act section 11M | Trading Licence Schedule 3 clause 1.5 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 111/111 | Energy Coordinatio n Act section 11M | Trading Licence Schedule 3 clause 1.7 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 112/112 | Energy Coordinatio n Act section 11M | Trading Licence Schedule 3 clause 2.1 to 2.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 113/113 | Energy Coordinatio n Act section 11M | Trading Licence Schedule 3 clause 3.1 | Moderate | Likely | High | Weak | 1 | | | | | ✓ | | |

GAS MARKETING CODE OF CONDUCT

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 114/114 | Energy Coordination Act section 11ZPP | Trading Licence clause 19.1. | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 115/115 | Energy Coordination Act sections 11ZPP and 11M | Trading Licence clause 19.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 116/116 | Energy Coordination Act section 11ZPP | Trading Licence clause 19.1 Code of Conduct clause 2.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 117/117 | Energy Coordination Act sections 11ZPP and 11M | Trading Licence clause 19.2 Code of Conduct clause 2.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 118/118 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.3(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |
| 119/119 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.3(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |
| 120/120 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.3(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | √ |
| 121/121 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.4(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |
| 122/122 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.4(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 123/123 | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.4(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |
| 124. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.4(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |
| 125. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | √ | |
| 126. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | √ | |
| 127. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | √ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|----------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 128. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 129. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 130. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 131. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 132. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.8(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 | Trading Licence clause 19 Code of Conduct clause 2.8(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

COMPENDIUM OF GAS CUSTOMER LICENCE OBLIGATIONS (COMPENDIUM)

| | | | | | | | | | | | | | | |
|---------|--|---|----------|----------|--------|----------|---|--|--|--|--|---|--|---|
| 134/145 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 3.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 135/146 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 3.1(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 136/147 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.1(a) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 137. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.1(b) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 138. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 139/148 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 140/149 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 141/150 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 142/151 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 143/152 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(6) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 144/153 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 145/154 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 146/155 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.4 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 147/156 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1) | Moderate | likely | High | Weak | 1 | | ✓ | | | | | |
| 148 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 149/157 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 150/158 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 151/159 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 152/160 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 153 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(2) | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 154/161 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 155/162 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2) | Moderate | Unlikely | Medium | Moderate | 4 | ✓ | | | | | | |
| 156/163 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(3) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 157/164 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.9 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 158/165 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.10 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 159/166 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 160/167 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 161/168 | Energy Coordination Act section M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 162 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(2) | Minor | Unlikely | Low | Moderate | 5 | | | | | | ✓ | |
| 163/169 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.13 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 164/172 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(1) | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 165/173 | Energy Coordination Act section M | Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 166/174 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.15 | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 167/175 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(a) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 168/175 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(b) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 169/176 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 170 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 171/177 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.17(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 172/178 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(2) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 173/179 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(3), 4.18(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 174/180. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(4), 4.18(5) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 175. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(6) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 176. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 177 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 178 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(3), 4.19(6) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 179 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(4), 4.19(6) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 180 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(5) | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 181/181 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1 | Moderate | Unlikely | Medium | Moderate | 4 | | | | ✓ | | | |
| 182/182 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 183/184 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.3 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 184/185 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.4 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 185/186 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.5 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 186/187 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 187/188 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 188/189 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 189/190 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 190/191 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 191/192 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 192 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 193/193 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 194/194 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 195/195 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 196/196 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 197/197 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.9 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 198/198 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 199/199 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 200/200 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 201/201 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 202/202 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 203/203 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(3) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 204/204 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | ✓ | | | |
| 205/205 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 206/206 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 207 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 208/207 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(1) | Minor | Unlikely | Low | Moderate | 5 | | | | | | | ✓ |
| 209/208 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(2) | Moderate | Likely | High | Moderate | 2 | | | | | ✓ | | |
| 210/209 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.7 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 211/210 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.8 | Moderate | Likely | High | Moderate | 2 | | | | | ✓ | | |
| 212/211 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(1) | Moderate | Likely | High | Moderate | 2 | | | | | ✓ | | |
| 213/212 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 214/213 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(1) | Moderate | Likely | High | Moderate | 2 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 215/214 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 216/215 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 217/216 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 218/217 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 219 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(6) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 220/218 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(7) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 221/219 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.11 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 222/220 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1 | Moderate | Unlikely | Medium | Moderate | 4 | | ✓ | | | | | |
| 223/221 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.2(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 224/222 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.3 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 225/223 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.4 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 227/225 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.6 | Major | Unlikely | High | Strong | 2 | | | | | ✓ | | |
| 228/226 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 229/227 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(2) | Moderate | Likely | High | Weak | 1 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 231/229 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 232/230 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 233/231 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 234/232 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 235/233 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 236/234 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 237/235 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 238/236 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.3 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 239/237 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4 | Moderate | Unlikely | Medium | Moderate | 4 | | ✓ | | | | | |
| 240/238 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 241/239 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 242. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 243. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 245/241 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.9 | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |
| 246/242 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(1) | Moderate | Likely | High | Moderate | 2 | | | | | | | ✓ |
| 247/243 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 248/244 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 249/245 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 250/246 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2) | Moderate | Unlikely | Medium | Moderate | 4 | | ✓ | | | | | |
| 251/247 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 252/248 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(a) and (b) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 253 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(c) and (d) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 254 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 255. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 256/250 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 257/251 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 258/252 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.4 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 259/253 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 260 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 262/254 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(a)(i)(xv) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 263/256 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(b)(i)- (ix) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 manual Ref number | Obligations under | Licence conditions | Consequences | Likelihood | Inherent Risk | Adequacy of Existing Controls | Review Priority | Rating 1 | Rating 2 | Rating 3 | Rating 4 | Rating 5 | Rating Na | Rating Nr |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|----------|----------|----------|-----------|-----------|
| 264. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(c) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 265 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 266 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 267/257 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.5 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 268/258 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.6 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 275/265 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.15 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 277. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 278. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 2013/10 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 |
|------------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 279/266 | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 280. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.18 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

NOVEMBER 2010 GAS COMPLIANCE MANUAL OBLIGATIONS

GAS MARKETING CODE OF CONDUCT

| 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 | Trading Licence clause 19 Code of Conduct clause 2.4(4) | Moderate | Likely | High | Weak | 1 | | | | | | ✓ | |
| 125. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 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 |
|---------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 126. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 127. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 128. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 129. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.5(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 130. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 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 |
|---------------------------------|--|---|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 131. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 132. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 133. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 134. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 135. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.6(6) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |
| 136. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clauses 2.6(7) and 2.6(8) | Minor | Unlikely | Low | Moderate | 5 | | | | | ✓ | | |

| 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 |
|---------------------------------|--|--|--------------|------------|---------------|-------------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 137. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 138. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 139. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7(3) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 140. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7(4) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 141. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.7(5) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 142. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.8 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

| 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 |
|------------------------|---------------------------------------|---|--------------|------------|---------------|-------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 143. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.11(1) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | | ✓ |
| 144. | Energy Coordination Act section 11ZPP | Trading Licence clause 19 Code of Conduct clause 2.11(2) | Moderate | Unlikely | Medium | Moderate | 4 | | | | | ✓ | | |

LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

| | | | | | | | | | | | | | | |
|------|-------------------------------------|---|----------|----------|--------|----------|---|--|--|--|--|--|---|---|
| 169. | Energy Coordination Act section 11M | Trading Licence clause 2.1 and Schedule 2 | Moderate | Unlikely | Medium | Moderate | 4 | | | | | | ✓ | |
| 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 | | | | | | | ✓ |
| 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 | | | | | | ✓ | |

| 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 |
|------------------------|-------------------------------------|---|--------------|------------|---------------|-------------------------------|-----------------|----------|----------|---------|----------|----------|-----------|-----------|
| 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 | | | | | | | ✓ |
| 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 | | | | | ✓ | | |