

**Landfill Gas & Power Post Audit Action Plan ERL11 – October 2014**

<b>Ref</b>	<b>Licence Condition</b>	<b>Issue</b>	<b>Recommendation</b>	<b>Post-Audit Action Plan</b>
18	Electricity Industry Customer Transfer Code clause 3.9(3)	The issue of obtaining Verifiable Consent (VC) is well managed. However, there is a risk that the VC may not be obtained for existing customers that open a new site.	<b>OFI 1</b> - Implement the VC form through the Senior Business Analyst/Project Administrator business controls (i.e. Create as field on excel spreadsheets used).	DATE: 30 October 2014  ACTION: Utiise the Business Control Spreadsheet  REPRESENTATIVE: Senior Business Analyst/Project Administrator
105	Electricity Industry Act section 17(1) Retail Licence condition 4.1	Payment of licence fees largely reliant on ERA notification and individual action.	<b>OFI 2</b> - An alternative trigger to payment could be established to ensure ongoing compliance. Consideration could be given to inclusion in budget allocation to ensure funds dispensed prior to 30 July each year, standing agenda item in monthly meeting or other such means that would provide a proactive trigger for payment.	DATE: 30 October 2014  ACTION: Include the payment of fees as a line item in the budget allocation prior to July 30 each year and as a standing agenda item in Management Meetings  REPRESENTATIVE: Chief Financial Officer

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124	Retail Licence condition 16.1  Late submission of the Annual Compliance Report for the reporting year 2011. It is noted all subsequent reports were submitted on time.	Submission of the Annual Compliance Report has been overlooked in 2011 and although subsequently submitted in a timely manner it further controls could be established to ensure ongoing compliance.	<b>OFI 3:</b> Although the non-compliance has been addressed, consideration could be given to imbedding this requirement into business processes to ensure not reliant on a specific individual. Such as creating as item of standing business agenda and including in the organisations internal audit processes.  Note: the issue of non-compliance was addressed during the audit period.	DATE: 30 October 2014  ACTION: Include as standing agenda item in the management meetings  REPRESENTATIVE: Chief Financial Officer
345	Electricity Industry Metering Code clause 3.3B  Develop processes to ensure that when a user who is aware of bi-directional flows at a metering point	Controls to identify bi-directional flows at customers sites other than those formally notified through the RRN process.  Evaluation of bills and usage data (i.e NEM 12 files) would also alert LGP to the	<b>OFI 4 -</b> Whilst compliance is noted a clear understanding of the obligation could be better demonstrated to ensure ongoing compliance and as such inclusion of the requirement in the Contract Tracker spreadsheet and development of a work	DATE: 30 October 2014  ACTION: Add all bi-directional meters to Contract Tracker and develop a work instruction for management bi-directional customers

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	which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows can notify the network operator within 2 business days	existence of bi-directional flows.	instruction/procedure could be considered.	REPRESENTATIVE: Project Administrator

Policy approved by:

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Tony Leahy

Manager Retail  
 Manager Finance

Date \_\_\_\_\_

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Graeme Alford

CEO

Date \_\_\_\_\_