



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

AER Retail Pty Ltd

Electricity Retail Licence ERL 18 Performance Audit





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Mr Luca Castelli
Director
AER Retail Pty Ltd

Dear Mr Castelli

Performance Audit Electricity Licences

The fieldwork on the performance audit of Retail Licence ERL 18 for the audit period (1 December 2014 to 30 November 2017) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were three non-compliances.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail licence (ERL 18) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 30 March 2018



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1 Electricity Retail Licence Audit

2 Executive Summary

This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*ERA*) for the audit period.

2.1 Overall Conclusion

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were 3 non-compliances requiring corrective actions. There are no issues with the integrity of reporting to the *ERA* or other statutory organisations.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail Licence (ERL 18) for the audit period based on the relevant clauses referred to within the scope section (Page 8) of this report.

2.2 Audit period

This audit covers the period 1 December 2014 to 30 November 2017.

2.3 The Licensee

The licensee AER Retail (AER)-ERL 18, is a small retailer (currently 73 customers -49 large consumers and 24 small). The business is as an electricity retailer.

2.4 Previous audit non-compliances and recommendations

There are 2 previous non-compliances or recommendations

Table of Previous Non-Compliances and Audit Recommendations				
A. Resolved before end of previous audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
B. Resolved during current Audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable



1/2015 105	<p>B2</p> <p><i>Electricity Industry Act section 17(1)</i></p> <p>A Licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.</p> <p>The Licensee paid the fees and within 30 days of ERA invoices. However, the ERA invoices were not issued in time with the requirement to pay by anniversary date. The control process for accounts payable operated correctly but the compliance control for meeting the anniversary date was defective. Controls are now in place to ensure payments made by anniversary date.</p>	Monitor time-based compliance controls for efficacy.	2015.	No further action required.
2/2015 124	<p>B2</p> <p><i>Retail Licence condition 16.1</i></p> <p>A Licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.</p> <p>The annual reports were completed and on time. However the issue of not paying fees by anniversary date should have been notified. Controls are good for meeting reporting dates but compliance controls failed.</p>	Monitor time-based compliance controls for efficacy.	2015.	No further action required.
C. Unresolved at end of current Audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation	Further action required (Yes/No/Not Applicable) & Details of further action required	

2.5 Issues from current audit

There are 3 issues from current audit.



2.5.1 Compliance elements requiring corrective measures

There are 3 actions that are non-compliant:

Table of Current Audit Non-Compliances/Recommendations			
A. Resolved during current Audit period			
Manual Ref.	Non-Compliance/Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors comments
Nil			
B. Unresolved at end of current Audit period			
Manual Ref.	Non-Compliance/Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors comments
1/2017 124	B2 <i>Retail Licence condition 16.1</i> Not all compliance reports on time.	Improve control processes to ensure that reports are submitted on time.	Complete by 30 June 2018
2/2017 292	B2 <i>Code condition 10.10(2)</i> The Code was not on the web site.	The Code was not on the web site but is now.	No further action required.
3/2017 306	B2 <i>Code condition 13.2</i> Not all compliance reports on time.	Improve control processes to ensure that reports are submitted on time.	Complete by 30 June 2018



3 Performance Audit

3.1 Performance Audit Objectives

Under section 13 of the *Electricity Industry Act 2004* (the Act), it is a requirement that every Licensee provide the Economic Regulation Authority (ERA) not less than once in every period of 2 years with a performance audit conducted by an independent expert acceptable to the ERA.

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in *applicable legislation*. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the *licence*; and
- (b) any other relevant matter in connection with the *applicable legislation* that the ERA determines should form part of the *performance audit*.

The licence also provides for individual licence conditions namely - the ERA may prescribe *individual performance standards* in relation to the Licensee of its obligations under this *licence* or the *applicable legislation* (the Act and subordinate legislation).

The audit was done in compliance with prevailing ERA documents “Audit and Review Guidelines: Electricity and Gas Licences (hereinafter “Guidelines”)¹ and the Electricity Compliance Reporting Manual (hereinafter “Manual”)². Note the audit period covers manuals from 2014 to 2017. The audit reflects all the applicable manuals and note that the 2017 changes do not affect retailers.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Retail Licence with approval from the ERA. A preliminary assessment was conducted with the Licensee’s management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

The audit was conducted by K McGill in accordance with the ERA Guidelines, in a manner consistent with Australian Auditing Standards ASAE 3000 Standard on assurance engagements, ASA 500: Audit Evidence, ASA 530 Audit sampling and AS/NZS 31000:2009: Risk Management.

McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Retail Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Retail Licence ERL 18 for the Licensee.

¹ Economic Regulation Authority: Audit and Review guidelines: Electricity, and Gas Licences April 2014

² Economic Regulation Authority: Electricity Compliance Reporting Manual September 2014, July 2016, October 2016, July 2017



3.2 Scope Limitation

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

The Licensee has no prepaid meters so items 245 to 271 have been deleted. There are no residential customers, so items 136, 147, 191-196, 200, 202-227, 231, 279, 294, 295 have been deleted. There are no customers with life support equipment so items 235-241 have been deleted. There are no non-contestable customers so items 275-278 have been deleted.

3.3 Inherent Limitations

Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.

An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

Any projection of the evaluation of the operating licences to future periods is subject to the risk that the compliance measures in the plans may become inadequate because of changes in conditions or circumstances, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

3.4 Statement of Independence

To the best of my knowledge and belief, there is no basis for contraventions of any professional code of conduct in respect of the audit.

I have not done or contemplate undertaking any other work with the Licensee.

There are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred:
 - where the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or
 - where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

There is no risk of a self-review threat as:

- no work has been undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
- the auditor is currently undertaking for the Licensee; or
- the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and



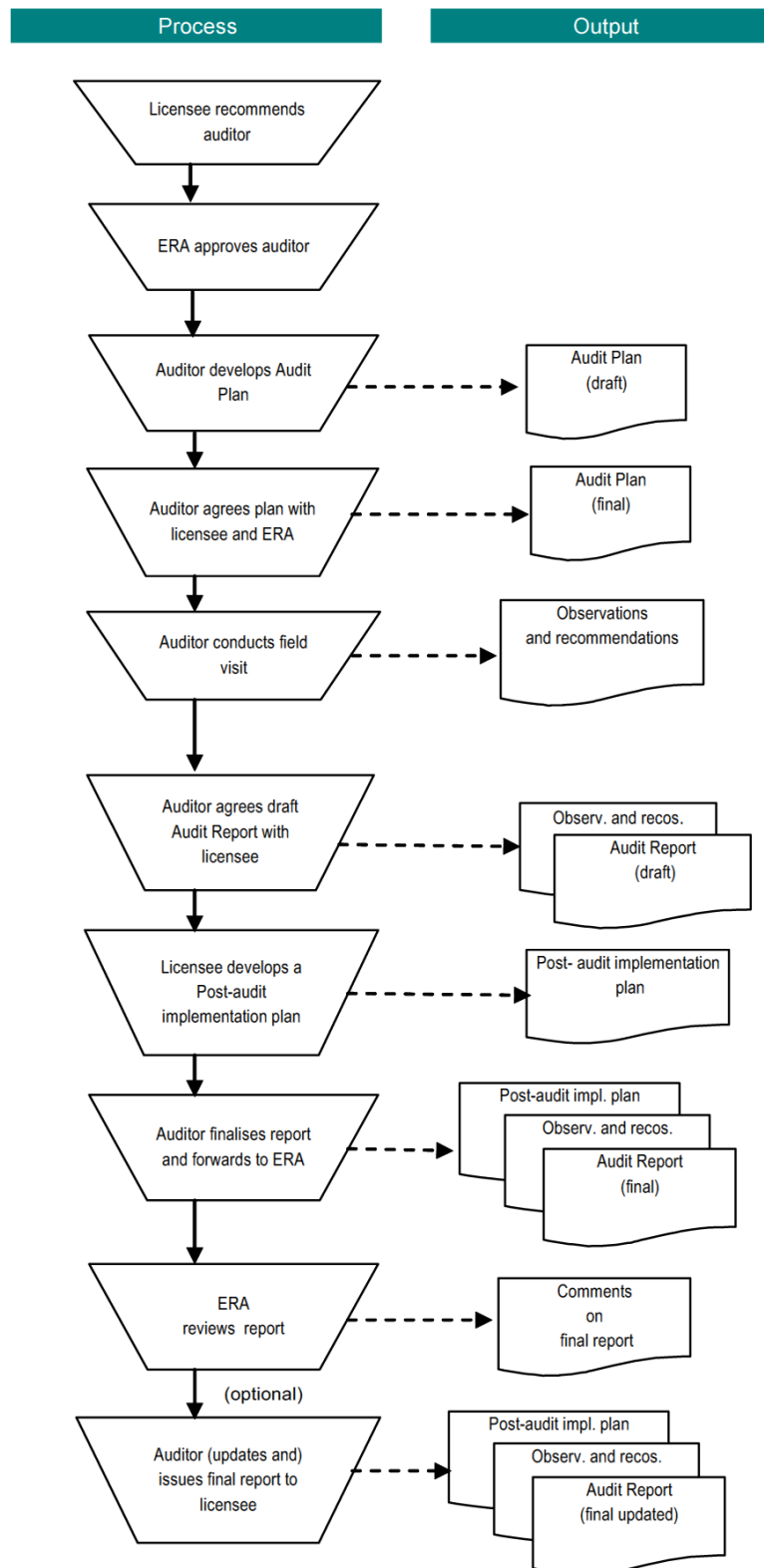
- there is no close family relationship with a Licensee, its directors, officers or employees, and
- the auditor is not, nor is perceived to be too sympathetic to the Licensee's interests.

3.5 Scope of the Audit

During this audit the Myaree office was visited.

The audit was conducted in accordance with the flow chart below:





3.6 Key Contacts Interviewed

The key contacts interviewed were:

- Licensee:



- Luca Castelli, Director AER Retail Pty Ltd
- Nicole Weston, Business Analyst AER Energy Pty Ltd

The audit was conducted during November 2017 to March 2018. Kevan McGill spent about 120 hours on the audit.

3.7 Audit Requirements

Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

Nature of audit work conducted

The ERA guidelines for performance audits require that the audit considers:

- Process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- Outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- Output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- Integrity of performance reporting** – the completeness and accuracy of the performance reporting to the ERA.
- Compliance with any individual licence conditions** - the requirements imposed on the specific Licensee by the ERA or specific issues for follow-up that are advised by the ERA.

3.8 Overall Conclusion

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail (ERL 18) licence for the audit period based on the relevant clauses referred to within the scope section of this report.

There are three non-compliances that required corrective actions by the licensee.

3.9 Findings

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in the detailed audit findings section (Page 19)

3.10 Audit compliance and controls rating scales

Performance audit compliance and controls rating scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties



C	Inadequate controls -significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties





Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Licence Type (R = Retail)	Type	Audit Priority	Adequacy of Controls (NP=Not Performed)					Compliance Rating (NR = Not Rated)				
Licence Conditions - Electricity Industry (Licence Conditions) Regulation Obligations - Electricity Industry Customer Transfer Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
6.	r ³ .5(2)	3.2(2)	R	2	4	✓					✓				
7.	5(2)	3.4(1)	R	2	4	✓					✓				
8.	5(2)	3.5(3)	R	2	4					✓					✓
9.	5(2)	3.6(2)	R	2	4					✓					✓
16.	5(2)	3.9(1)	R	2	4	✓					✓				
17.	5(2)	3.9(2)	R	2	4					✓					✓
18.	5(2)	3.9(3)	R	2	4	✓					✓				
19.	5(2)	3.9(4)	R	2	4	✓					✓				
23.	5(2)	4.2(2)	R	2	4	✓					✓				
24.	5(2)	4.3	R	2	4	✓					✓				
25.	5(2)	4.4(1)	R	2	4	✓					✓				
26.	5(2)	4.4(2)	R	2	4					✓					✓
27.	5(2)	4.5(1)	R	2	4	✓					✓				
28.	5(2)	4.6(3)	R	2	4					✓					✓
29.	5(2)	4.7	R	2	4	✓					✓				
30.	5(2)	4.8(2)	R	2	4					✓					✓
34.	5(2)	4.9(6)	R	2	4	✓					✓				
39.	5(2)	4.11(3)	R	2	4					✓					✓
40.	5(2)	4.12(3)	R	NR	5	✓					✓				
43.	5(2)	4.15	R	NR	5					✓					✓
44.	5(2)	4.16	R	2	4	✓					✓				
45.	5(2)	4.17	R	2	4	✓					✓				
48.	5(2)	5.2	R	2	4	✓					✓				
48A ⁴ .	5(2)	6.1	R	2	4	✓					✓				
49.	5(2)	6.2	R	2	4	✓					✓				
52.	5(2)	6.4(1)	R	2	4					✓					✓
53.	5(2)	6.4(2)	R	2	4					✓					✓
54.	5(2)	6.6	R	2	4	✓					✓				

³ r = Regulation

⁴ Inserted October 2016



Licence Conditions - Electricity Industry (Licence Conditions) Regulation Obligations - Electricity Industry Customer Transfer Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
55.	5(2)	7.1(1)	R	NR	5					✓					✓
56.	5(2)	7.1(2)	R	NR	5					✓					✓
57.	5(2)	7.1(3)	R	2	4					✓					✓
58.	5(2)	7.2(4)	R	NR	5					✓					✓
59.	5(2)	7.3(2)	R	NR	5					✓					✓
68 ⁵ .	5(2)	Annex 6 clause A6.2(a)	R	NR	5	✓					✓				
69 ⁶ .	5(2)	Annex 6 clause A6.2(b)	R	2	4	✓					✓				
70 ⁷ .	5(2)	Annex 6 clause A6.6	R	NR	5	✓					✓				
71 ⁸ .	5(2)	Annex 6 clause A6.7	R	NR	5	✓					✓				

Licence Conditions – Licence Clause – Retail Obligations- (Customer Contracts) regulations						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
78.	5.1	s51	R	2	4					✓					✓	
79.	5.1	r5	R	2	4	✓					✓					
80.	5.1	r6	R	2	4	✓					✓					
81.	5.1	r7	R	2	4	✓					✓					
82.	5.1	r8	R	2	4	✓					✓					
83.	5.1	r9	R	2	4	✓					✓					
84.	5.1	r10	R	2	4	✓					✓					
85.	5.1	r11	R	2	4	✓					✓					
86.	5.1	r12	R	2	4	✓					✓					
87.	5.1	r13	R	2	4	✓					✓					
88.	5.1	r14	R	2	4	✓					✓					
89.	5.1	r15	R	2	4	✓					✓					
90.	5.1	r16&34	R	2	4	✓					✓					
91.	5.1	r17	R	2	4	✓					✓					
92.	5.1	r18	R	2	4	✓					✓					
93.	5.1	r19	R	2	4	✓					✓					
94.	5.1	r20	R	2	4	✓					✓					
95.	5.1	r21	R	2	4	✓					✓					
96.	5.1	r32	R	2	4	✓					✓					
97.	5.1	r33(2)	R	2	4					✓					✓	
98.	5.1	r33(3)&(4)	R	2	4	✓					✓					
100.	28.1	r.38	R	2	4					✓					✓	

⁵ Deleted October 2016 applies up to that date.

⁶ Deleted October 2016 applies up to that date.

⁷ Deleted October 2016 applies up to that date.

⁸ Deleted October 2016 applies up to that date.



Licence Conditions – Licence Clause – Retail Obligations- Electricity Industry Act Section					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
101.	14.1	s ⁹ 13(1)	R	NR	5	✓					✓				
105.	4.1	s17(1)	R	2	4	✓					✓				
106.	5.1	s31(3)	R	NR	5					✓					✓
107.	5.1	s41(6)	R	2	4					✓					✓
108.	24.1	s54(1)	R	2	4	✓					✓				
109.	25.4	s54(2)	R	2	4	✓					✓				
110.	27.1	s76	R	2	4					✓					✓
111.	21.1	s101	R	2	4	✓					✓				
113.	5.1	s115(2)	R	2	4	✓					✓				

Licence Conditions – Electricity Industry Act Section Obligations- Licence Clause – Retail					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
114.	s11	23.1	R	2	4	✓					✓				
115.	s11	23.2	R	2	4					✓					✓
116.	s11	24.2	R	NR	5	✓					✓				
117.	s11	24.3	R	NR	5	✓					✓				
118.	s11	25.1	R	2	4	✓					✓				
119.	s11	12.1	R	2	4	✓					✓				
120.	s11	13.4	R	2	4					✓					✓
121.	s11	14.2	R	2	4	✓					✓				
123.	s11	15.1	R	2	4					✓					✓
124.	s11	16.1	R	2	4		✓					✓			
125.	s11	17.1&17.2	R	2	4	✓					✓				
126.	s11	18.1	R	2	4	✓					✓				

Licence Conditions – Licence clause Obligations- Electricity Industry Code of Conduct Clause						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
Marketing Licence condition 23.1																
129.	s82	2.1	R	2	4	✓					✓					
130.	s82	2.2(1)	R	2	4					✓						✓
131.	s82	2.2(2)	R	2	4					✓						✓
132.	s82	2.3(1)	R	2	4	✓					✓					
133.	s82	2.3(2)	R	2	4	✓					✓					
135.	s82	2.3(5)	R	2	4	✓					✓					
137.	s82	2.4(2)	R	2	4	✓					✓					
138.	s82	2.5(1)	R	2	4					✓						✓
139.	s82	2.5(2)	R	2	4	✓					✓					
140.	s82	2.6	R	2	4	✓					✓					
141.	s82	2.9	R	2	4					✓						✓
142.	s82	2.10	R	2	4					✓						✓
Connection																
143.	s82	3.1(1)	R	2	4					✓						✓
144.	s82	3.1(2)	R	2	4					✓						✓
Billing																
145.	s82	4.1	R	2	4	✓					✓					
146.	s82	4.2(1)	R	2	4					✓						✓
148.	s82	4.2(3)	R	2	4					✓						✓
149.	s82	4.2(4)	R	2	4					✓						✓
150.	s82	4.2(5)	R	2	4					✓						✓

⁹ s = Section of Act



Licence Conditions – Licence clause Obligations- Electricity Industry Code of Conduct Clause						Priority					Adequacy of controls rating					Compliance Rating					
						A	B	C	D	NP	1	2	3	4	NR						
151.	s82	4.2(6)	R	2	4					✓						✓					
152.	s82	4.3(1)	R	2	4					✓						✓					
153.	s82	4.3(2)	R	2	4					✓						✓					
154.	s82	4.4	R	2	4	✓					✓										
155.	s82	4.5(1)	R	2	4	✓					✓										
156.	s82	4.5(3)	R	2	4					✓						✓					
157.	s82	4.6(1)	R	2	4	✓					✓										
158.	s82	4.7	R	NR	4	✓					✓										
159.	s82	4.8(1)	R	2	4					✓						✓					
160.	s82	4.8(2)	R	2	4					✓						✓					
161.	s82	4.8(3)	R	2	4					✓						✓					
162.	s82	4.9	R	2	4					✓						✓					
163.	s82	4.10	R	NR	5					✓						✓					
164.	s82	4.11(1)	R	2	4					✓						✓					
165.	s82	4.11(2)	R	2	4					✓						✓					
166.	s82	4.12(1)	R	2	4					✓						✓					
167.	s82	4.13	R	2	4					✓						✓					
168.	s82	4.14(1)	R	NR	5					✓						✓					
169.	s82	4.14(2)	R	2	4					✓						✓					
170.	s82	4.14(3)	R	2	4					✓						✓					
171.	s82	4.15	R	2	4	✓					✓										
172.	s82	4.16(1)(a)	R	2	4	✓					✓										
173.	s82	4.16(1)(b)	R	2	4	✓					✓										
174.	s82	4.16(2)	R	2	4	✓					✓										
175.	s82	4.16(3)	R	2	4					✓						✓					
176.	s82	4.17(2)	R	2	4					✓						✓					
176A.	s82	4.17(3)	R	NR	5					✓						✓					
177.	s82	4.18(2)	R	NR	5	✓					✓										
178.	s82	4.18(3)	R	2	4	✓					✓										
179.	s82	4.18(4)	R	NR	5	✓					✓										
180.	s82	4.18(6)	R	NR	5					✓						✓					
181.	s82	4.18(7)	R	NR	5					✓						✓					
182.	s82	4.19(1)	R	2	4					✓						✓					
183.	s82	4.19(2)	R	NR	5					✓						✓					
184.	s82	4.19(3)	R	2	4					✓						✓					
185.	s82	4.19(4)	R	NR	5					✓						✓					
186.	s82	4.19(7)	R	NR	5					✓						✓					
Payment																					
187.	s82	5.1	R	2	4	✓					✓										
188.	s82	5.2	R	2	4	✓					✓										
189.	s82	5.3	R	2	4					✓						✓					
190.	s82	5.4	R	2	4					✓						✓					
197.	s82	5.7(1)	R	2	4	✓					✓										
198.	s82	5.7(2)	R	2	4					✓						✓					
199.	s82	5.7(4)	R	2	4	✓					✓										
201.	s82	5.8(2)	R	2	4	✓					✓										
201A.	s82	5.9	R	NR	5					✓						✓					
Payment Difficulties & Financial Hardship																					
228.	s82	6.11	R	2	4					✓						✓					
Disconnection																					
229.	s82	7.1(1)	R	2	4					✓						✓					
230.	s82	7.2(1)	R	2	4					✓						✓					
232.	s82	7.4(1)	R	2	4					✓						✓					
234.	s82	7.6	R	1	2					✓						✓					
Reconnection																					



Licence Conditions – Licence clause Obligations- Electricity Industry Code of Conduct Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
242.	s82	8.1(1)	R	2	4					✓					✓
243.	s82	8.1(2)	R	2	4					✓					✓
Information & Communication															
272.	s82	10.1(1)	R	2	4	✓					✓				
273.	s82	10.1(2)	R	2	4					✓					✓
274.	s82	10.1(3)	R	2	4					✓					✓
280.	s82	10.3A	R	2	4	✓					✓				
281.	s82	10.4	R	2	4					✓					✓
282.	s82	10.5	R	2	4					✓					✓
290.	s82	10.9	R	NR	5	✓					✓				
291.	s82	10.10(1)	R	2	4					✓					✓
292.	s82	10.10(2)	R	2	4		✓					✓			
297	S82	10.12(2)	R	2	4					✓					✓
Complaints & Dispute Resolution															
298.	s82	12.1(1)	R	2	4	✓					✓				
299.	s82	12.1(2)	R	2	4	✓					✓				
300.	s82	12.1(3)	R	2	4					✓					✓
301.	s82	12.1(4)	R	2	4					✓					✓
302.	s82	12.2	R	2	4	✓					✓				
303.	s82	12.3	R	2	4					✓					✓
304.	s82	12.4	R	2	4					✓					✓
Reporting															
305.	s82	13.1	R	2	4	✓					✓				
306.	s82	13.2	R	2	4		✓					✓			
307.	s82	13.3	R	2	4	✓					✓				
Service Standard Payments															
308.	s82	14.1(1)	R	2	4					✓					✓
310.	s82	14.2(1)	R	2	4					✓					✓
312.	s82	14.3(1)	R	2	4					✓					✓
315.	s82	14.7(1)	R	2	4					✓					✓

Licence Conditions – Licence clause Obligations- Electricity Industry Metering Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
324.	5.1	3.3B	R	2	4	✓					✓				
339.	5.1	3.11(3)	R	2	3					✓					✓
364.	5.1	3.27	R	2	4					✓					✓
371.	5.1.	4.4(1)	R	NR	5					✓					✓
372.	5.1	4.5(1)	R	NR	5	✓									✓
373.	5.1	4.5(2)	R	2	4					✓					✓
388.	5.1	5.4(2)	R	2	5					✓					✓
401.	5.1	5.16	R	2	4					✓					✓
402.	5.1	5.17(1)	R	2	4					✓					✓
405.	5.1	5.18	R	2	4					✓					✓
406.	5.1	5.19(1)	R	NR	5					✓					✓
407.	5.1	5.19(2)	R	NR	5					✓					✓
408.	5.1	5.19(3)	R	2	4					✓					✓
410.	5.1	5.19(6)	R	NR	5	✓					✓				
416.	5.1	5.21(5)	R	2	4					✓					✓
417.	5.1	5.21(6)	R	2	4					✓					✓
435.	5.1	5.27	R	2	4					✓					✓
448.	5.1	6.1(2)	R	2	4	✓					✓				
451.	5.1	7.2(1)	R	NR	5	✓					✓				
453.	5.1	7.2(4)	R	2	4					✓					✓



Licence Conditions – Licence clause Obligations- Electricity Industry Metering Code Clause						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
454	5.1	7.2(5)	R	2	4					✓					✓	
455	5.1	7.5	R	2	4	✓					✓					
456	5.1	7.6(1)	R	2	4					✓					✓	
457	5.1	8.1(1)	R	NR	5					✓					✓	
458	5.1	8.1(2)	R	NR	5					✓					✓	
459	5.1	8.1(3)	R	NR	5					✓					✓	
460	5.1	8.1(4)	R	2	4					✓					✓	
461	5.1	8.3(2)	R	NR	5					✓					✓	

3.11 Establishing the Context

The key legislation that governs the licensing of providers of electricity is the Electricity Industry Act 2004. In turn, the compliance elements in the organisation's Operating Licence were examined and referred to throughout the audit process.

3.11.1 Audit Results and Recommendations

Summary of significant results

There are 3 non-compliances.

3.11.2 Compliance elements requiring Corrective measures

There are 2 issues requiring further corrective action and 1 issue that is complete:

Table of Current Audit Non-Compliances/Recommendations			
A. Resolved during current Audit period			
Manual Ref.	Non-Compliance/Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors comments
Nil			
B. Unresolved at end of current Audit period			
Manual Ref.	Non-Compliance/Controls improvement (Rating / Legislative Obligation / Details of Non-Compliance or inadequacy of controls)	Date Resolved (& management action taken)	Auditors comments
1/2017 124	B2 Retail Licence condition 16.1 Not all compliance reports on time.	Improve control processes to ensure that reports are submitted on time.	Complete by 30 June 2018
2/2017 292	B2 Code condition 10.10(2) The Code was not on the web site.	The Code was not on the web site but is now.	No further action required.



3/2017 306	B2 Code condition 13.2 Not all compliance reports on time.	Improve control processes to ensure that reports are submitted on time.	Complete by 30 June 2018
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3.11.3 Suggestions for improvement

There are no suggestions for improvement.

3.11.4 Post Audit Implementation Plan

The Licensee will address any post audit actions with one issue requiring action for two items and no actions to be given in a post audit plan where corrections have already been made for 1 item.

3.12 Detailed findings

The following sets out the audit findings

3.12.1 Audit work undertaken

We conducted interviews and enquiries to:

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and
- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.13 Audit evidence

- Retail Licence
- Financial statements and statement of accountant.
- Licence fee invoices, journal entries
- ERA annual returns
- Verifiable consent file
- Sample transfers
- Portal screen captures.
- Client files
- Financial reports
- ERA fee invoices and receipts
- Access Contract (ETAC)
- ERA Approval of auditor - 2017 Audit and Review - ERL018 - AER Retail Pty Ltd
- Letter from ERA Approving Audit Plan
- ERA approval of standard form contract
- Performance report
- Compliance reports



- Complaints process
- CPI tariff increase notice
- Sample bills
- Bill review request and response
- Standard form contract
- Non-standard contract
- Transfer requests numbers
- Meter data request numbers
- Marketing policy
- ID badge





3.14 Audit Findings - Details

The following sets out the audit findings

3.14.1 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations

Item 6 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Electricity Industry Customer Transfer Code 3.2(2) A retailer must submit a separate data request for each exit point unless otherwise agreed.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers on portal, Portal screen captures		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Transfers in the audit period (82) took place using the Western Power portal which constrains data requests to exit points. The portal does not allow data requests for more than one NMI (exit point) at a time.		
Issues		
None		
Recommendations		
None		

Item 7 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Electricity Industry Customer Transfer Code 3.4(1) A retailer, unless otherwise agreed, must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers on portal. Portal screen captures		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There have been 2788 data requests. All transfers are conducted electronically with the portal. The portal does not allow data requests for more than the prescribed number (20) per day. However, the Licensee has sought and obtained Western Power approval to extend this to 50 per day.		
Issues		
None		
Recommendations		
None		

Item 8 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 3.5(3)		



A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.

Observations

Documents ☐ Compliance ☐

Evidence: interviewed Director, Business Analyst. Documents: verifiable consent forms

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

All customers have verifiable consent. There have been requests for historical consumption data on the Portal but all with current verifiable consents. There has been no need to withdraw a request because of no verifiable consent.

Issues

None

Recommendations

None

Item 9	Adequacy of controls rating	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Performed	Not Rated

Licence: Retail

Electricity Industry Customer Transfer Code 3.6(2)

A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a request for historical consumption data that has been subsequently withdrawn.

Observations

Documents ☐ Compliance ☐

Evidence: interviewed Director, Business Analyst. Documents: client file

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

There have been no withdrawn requests.

Issues

None

Recommendations

None

Item 16	Adequacy of controls rating	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	A	1

Licence: Retail

Electricity Industry Customer Transfer Code 3.9(1)

A retailer may only use data relating to a contestable customer to provide a contestable customer with a quotation for the supply of electricity by the retailer or to initiate a transfer of that contestable customer.

Observations

Documents ☒ Compliance ☒

Evidence: interviewed Director, Business Analyst. Documents: client file, data base.

Process ☒ Outcome ☒ Output ☒ Reporting ☒ Compliance ☒

There have been quotes for supply. A written consent is maintained on file. AER maintains a contestable customer's historical consumption data for its own internal purposes only. AER's metering and retail pricing data base does not allow for the association of meter data from another customer.

Issues

None

Recommendations

None



Item 17 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(2) A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no requests not to aggregate data.									
Issues									
None									
Recommendations									
None									

Item 18 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(3) A retailer must not disclose a contestable customer's data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No data has been disclosed. A written consent is maintained on file. AER maintains a contestable customer's historical consumption data for its own internal purposes only.									
Issues									
None									
Recommendations									
None									

Item 19 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(4) A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Verifiable consent forms.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Verifiable consent forms sighted. All VCFs are maintained in electronic format. Internal procedures require that an electronic copy of all documents be maintained perpetually. There are external drives for data security and hard copy of all VCFs. The retention policy is not to delete any information.									



Issues
None
Recommendations
None

Item 23 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.2(2) A retailer must submit a separate customer transfer request for each exit point unless otherwise agreed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Customer transfers were carried out with Western Power Portal which constrains customer transfer requests to single requests for exit points. The portal does not allow transfer requests for more than one NMI at a time. Western Power is responsible for allocating NMIs to exit points.									
Issues									
None									
Recommendations									
None									

Item 24 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.3 A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer which submitted the customer transfer request or to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers are conducted electronically with the portal. The portal provides for transfer reasons of either "Erroneous Transfer" or "New Customer Transfer" and requires that one of them be checked as a condition of acceptance.									
Issues									
None									
Recommendations									
None									



Item 25 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.4(1) A retailer may only submit a customer transfer request if it has an access contract for the network, unless it is to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: ETAC									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
AER has an ETAC with a 5-year term and option to extend for a further 5 years. Western Power only issues authority to access the portal to those with an ETAC.									
Issues									
None									
Recommendations									
None									

Item 26 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.4(2) A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
A transfer was requested but the customer's site was not complete to accept supply and the transfer did not proceed and there was nothing to reverse. Retailers have the functionality to cause a customer to be transferred to them (normal) or away from them after having first caused a customer to be erroneously transferred to them. They do not have the functionality to direct Western Power to transfer a customer to a particular party. Consequently, a notice of Erroneous Transfer informs Western Power to restore the customer to its original retailer.									
Issues									
None									
Recommendations									
None									

Item 27 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1	
Licence: Retail			
Electricity Industry Customer Transfer Code 4.5(1) A retailer must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date, unless otherwise agreed.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



Evidence: interviewed Director, Business Analyst. Documents: Portal screen, transfer documents									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers were requested electronically via the Western Power portal which is on the internet (TCP/IP as per definition of electronic) and this Portal constrains the number of transfers to less than the prescribed number and thus meets the requirement for the retailer. The portal limits customer transfers to the prescribed limit of 20, which limit also applies to transfers with the same nominated transfer date. However, the Licensee has sought and obtained Western Power approval to extend this limit to 50 per day.									
Issues									
None									
Recommendations									
None									

Item 28 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.6(3) A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No Verifiable Consents have ceased. Verifiable Consent to transfer is different from Verifiable Consent to access data. In practice, a customer would only be transferred after contractual terms have been agreed and the consent to transfer would be implicit in those terms in order for the retailer to fulfil its obligations. Equally, withdrawal of consent to transfer would constitute breach of contract. There were no transfers to be withdrawn due to ceasing of Verifiable Consent.									
Issues									
None									
Recommendations									
None									

Item 29 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.7 A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Transfer requests nominated a transfer date as the requests used the Western Power portal which requires a transfer date to be nominated. Transfers are entered into the portal shortly before they are due to take place, bearing in mind that Western Power requires 3 business									



days in the metro area to transfer customers to the new retailer, and 5 business days for country areas. There were no erroneous transfers to reverse.

Issues

None

Recommendations

None

Item 30 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 4.8(2) A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal. Portal screen captures, client file		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
A transfer request was withdrawn and a transfer did not occur, so there was no transfer to reverse. Western Power did not provide and/or install a meter, so, no costs to pay. Western Power issues a monthly invoice detailing chargeable transactions.		
Issues		
None		
Recommendations		
None		

Item 34 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
Licence: Retail,		
Electricity Industry Customer Transfer Code 4.9(6) A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer on portal screen captures, client file. Email sighted		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Western Power requested a later transfer date which was accepted.		
Issues		
None		
Recommendations		
None		

Item 39 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 4.11(3)		



A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
All meters were read before transfers occurred. This provision relates to transfers between retailers. It entails the retailer accepting Western Power's reasonable endeavours to make a transfer on time. It is not practicable for the meter to be not read as contestable meters store data for 35 days and is usually read remotely.									
Issues									
None									
Recommendations									
None									

Item 40 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.12(3) The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: ETAC									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There was a change to AER ETAC which was accepted.									
Issues									
None									
Recommendations									
None									

Item 43 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.15 In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and if applicable AEMO) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
A transfer was requested but the customer's site was not ready and the transfer did not proceed and therefore was not reversed. This provision applies when a retailer mistakenly instructs Western Power to allocate to it a new customer but as it was not transferred, no rights and obligations were affected.									
Issues									
None									

**Recommendations**

None

Item 44 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.16 A verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request must be retained by the incoming retailer for two years, except in the case of a customer transfer request to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All VCFs are maintained in electronic format. Internal procedures require that an electronic copy of all documents be maintained perpetually. A transfer was requested but the customer was not ready and the transfer did not proceed so was not an erroneous transfer to be reversed.									
Issues									
None									
Recommendations									
None									

Item 45 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.17 A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfer, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Previous customers have not been billed for charges after the transfer. Invoicing is based only on meter data provided through the "Meter Data Notify" function; data delivered to that facility pertains only to a bona fide customer (albeit which may subsequently be reversed and cancelled). Consequently, the customer is known to have transferred once its data commences or ceases to be provided through that facility.									
Issues									
None									
Recommendations									
None									

Item 48 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Electricity Industry Customer Transfer Code 5.2		



A network's communication rules apply in respect of data and information communication between the network operator and a retailer under this Code.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Director, Business Analyst. Documents: Sample transfers, portal screen captures

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All transfers and data transactions are done electronically with the portal. Communication with Western Power's account manager is via email and standard formats.

Issues

None

Recommendations

None

Item 48A Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.1 All notices must be in writing and delivered as described in subclauses 6.1(a)-(c).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Sample transfers, portal screen captures									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All notices are done electronically with the portal. All methods were available and comply with 6.1(a)-(c).									
Issues									
None									
Recommendations									
None									

Item 49 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.2 A licensee's notice in relation to a data request or customer transfer request must identify the connection point to which it relates.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: portal screen captures									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee's notice in relation to a data request or customer transfer request identifies the connection point. All transfers and data transactions are done electronically with the portal. Western Power uses the NMI as the unique identifier. Western Power is responsible for allocating NMIs to connection (exit) points.									
Issues									
None									
Recommendations									



None

Item 52 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.4(1) A retailer must notify its contact details to a network operator within three business days of a request.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The network operator has not made a request. The contact details were provided with the initial access contract.									
Issues									
None									
Recommendations									
None									

Item 53 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.4(2) A retailer must notify any change in its contact details to a network operator at least three business days before the change takes effect.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There was no change during the audit period.									
Issues									
None									
Recommendations									
None									

Item 54 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.6 A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with the communication rules.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The use of the Western Power portal satisfies the requirements the communication rules. Fax and email are in accordance with the requirements. All transfers and data transactions are									



done electronically with the portal. Other communications are by email to the correct addresses.

Issues

None

Recommendations

None

Item 55 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 7.1(1) For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No disputes have occurred.									
Issues									
None									
Recommendations									
None									

Item 56 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 7.1(2) If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No disputes have occurred.									
Issues									
None									
Recommendations									
None									

Item 57 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 7.1(3)		



If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.

ObservationsDocuments ☐ Compliance ☐**Evidence:** interviewed Director, Business Analyst. Documents: Not applicableProcess ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

No disputes have occurred.

Issues

None

Recommendations

None

Item 58 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 7.2(4) A disputing party that refers a dispute to the arbitrator must provide the arbitrator with prescribed details of the nature of the dispute.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: interviewed Director, Business Analyst. Documents: Not applicable		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
No disputes have occurred, so no referral.		
Issues		
None		
Recommendations		
None		

Item 59 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 7.3(2) A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: interviewed Director, Business Analyst. Documents: Not applicable		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
No disputes have occurred.		
Issues		
None		
Recommendations		
None		



Item 68 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a) A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Portal screen views									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication systems meet this requirement. There are back up systems/power supplies. All transfers and data transactions are done electronically with the portal which provides the prescribed availability. Other communications are by email and are available at all times. This requirement ceased in October 2016.									
Issues									
None									
Recommendations									
None									

Item 69 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Annex 6 clause A6.2(b) A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Portal screens									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication system meets the requirements. All transfers and data transactions are done electronically with the portal which provides the prescribed automatic responses. Procedures in place to send reply to all Western Power emails. This requirement ceased in October 2016.									
Issues									
None									
Recommendations									
None									

Item 70 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1	
Licence: Retail			
Electricity Industry Customer Transfer Annex 6 clause A6.6 The originator of an electronic communication must identify itself in the communication.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Portal screens			



Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication system meets the requirements. All transfers and data transactions are done electronically with the portal which provides the prescribed identification. This requirement ceased in October 2016.									
Issues									
None									
Recommendations									
None									

Item 71 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code Annex 6 clause A6.7 The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Portal screens									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication system meets the requirements. There is a consistent response. All transfers and data transactions are done electronically with the portal which provides the prescribed consistency. This requirement ceased in October 2016.									
Issues									
None									
Recommendations									
None									



3.14.2 Electricity Industry (Customer Contracts) Regulations– Licence Conditions and Obligations

Item 78 Electricity Industry Act s.51.	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Retail Licence condition 5.1 Where the licensee supplies electricity under a standard form contract, the standard form contract must comply with that licensee approved standard form contract on the ERA's website.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Standard Form Contract, Sample contracts		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
All the Customers are on a non-standard contract. The Licensee has an approved Standard Form Contract (SFC). Amendments have been approved by ERA.		
Issues		
None		
Recommendations		
None		

Item 79 Electricity Industry (Customer Contracts) Regulations 2005 r.5.	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Retail Licence condition 5.1 A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has a non-standard contract that is easy to read and expressed in clear, simple and concise language.		
Issues		
None		
Recommendations		
None		

Item 80 Electricity Industry (Customer Contracts) Regulations 2005 r.6.	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Retail Licence condition 5.1 A non-standard contract must specify when it comes into effect and the period for which it has effect.		
Observations		



Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The non-standard contract that specifies when it comes into effect and the period for which it has effect (CI 3).				
Issues				
None				
Recommendations				
None				

Item 81 Electricity Industry (Customer Contracts) Regulations 2005 r.7.	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
A non-standard contract must specify certain information about the retailer.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has the prescribed information in the non-standard contract i.e. company name/business name; ABN; registered office; postal address, telephone number; email address and Internet web site address. (CI 26.9)		
Issues		
None		
Recommendations		
None		

Item 82 Electricity Industry (Customer Contracts) Regulations 2005 r.8.	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
A non-standard contract must give an exact description of the goods and services that the retailer will provide under the contract.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The non-standard contract gives the required exact description of the goods and services that the retailer will provide under the contract. (CI 1)		
Issues		
None		
Recommendations		
None		



Item 83 Electricity Industry (Customer Contracts) Regulations 2005 r.9.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must require the customer to pay for electricity supplied under the contract.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 4).									
Issues									
None									
Recommendations									
None									

Item 84 Electricity Industry (Customer Contracts) Regulations 2005 r.10.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 15).									
Issues									
None									
Recommendations									
None									

Item 85 Electricity Industry (Customer Contracts) Regulations 2005 r.11.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 9&10).									
Issues									
None									
Recommendations									
None									



Item 86 Electricity Industry (Customer Contracts) Regulations 2005 r.12.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must require the retailer to deal with security deposits and the payment of interest in the manner that is specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 13).									
Issues									
None									
Recommendations									
None									

Item 87 Electricity Industry (Customer Contracts) Regulations 2005 r.13.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must describe the retailer's obligations in relation to the provision of prices and tariff information.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 4&6).									
Issues									
None									
Recommendations									
None									

Item 88 Electricity Industry (Customer Contracts) Regulations 2005 r.14.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must describe the procedures to be followed by the retailer in relation to the preparation, issue and review of customer bills.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 8).									
Issues									
None									
Recommendations									



None

Item 89 Electricity Industry (Customer Contracts) Regulations 2005 r.15.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 22).									
Issues									
None									
Recommendations									
None									

Item 90 Electricity Industry (Customer Contracts) Regulations 2005 r.16&34.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent and describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published. The non-standard contract must require the retailer to notify the customer of any amendment to the contract.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 4.3&6).									
Issues									
None									
Recommendations									
None									

Item 91 Electricity Industry (Customer Contracts) Regulations 2005 r.17.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



The non-standard contract that gives the required information (CI 26.1(b)).
Issues
None
Recommendations
None

Item 92 Electricity Industry (Customer Contracts) Regulations 2005 r.18.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must describe the procedures that must be followed by the retailer in responding to a complaint made by a customer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 21).									
Issues									
None									
Recommendations									
None									

Item 93 Electricity Industry (Customer Contracts) Regulations 2005 r.19.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 23).									
Issues									
None									
Recommendations									
None									

Item 94 Electricity Industry (Customer Contracts) Regulations 2005 r.20.	Adequacy of controls rating A	Compliance rating 1	
Licence: Retail			
A non-standard contract must specify the governing legislation, the effect of an invalid or unenforceable provision, the way in which notice may be given and the use of electronic communication by the retailer.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 26.3, 26.6 & 26.7).									
Issues									
None									
Recommendations									
None									

Item 95 Electricity Industry (Customer Contracts) Regulations 2005 r.21.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must not include a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract does not give the required information covered by Code which is permitted by Code CI 1.10. (as discussed in Non-standard contract CI 2 (c))									
Issues									
None									
Recommendations									
None									

Item 96 Electricity Industry (Customer Contracts) Regulations 2005 r.32.	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
A non-standard contract must include details about the cooling off period specified in the regulation.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The non-standard contract that gives the required information (CI 22).									
Issues									
None									
Recommendations									
None									

Item 97 Electricity Industry (Customer Contracts) Regulations 2005 r.33(2).	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		



A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.

Observations

Documents ☐ Compliance ☐

Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

The non-standard contract are fixed term contracts, so r33(2) does not apply.

Issues

None

Recommendations

None

Item 98 Electricity Industry (Customer Contracts) Regulations 2005 r.33(3) & (4).	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.		
Observations		
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
Evidence: interviewed Director, Business Analyst. Documents: Non-standard Contract, Sample contracts		
Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
The non-standard contract that gives the required information (CI 22).		
Issues		
None		
Recommendations		
None		

Item 100 Electricity Industry (Customer Contracts) Regulations r.38	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Retail Licence condition 28.1 If a licensee becomes aware of a customer taking a supply of electricity that is deemed to be supplied under the licensee's standard form contract, the licensee must notify the customer within 5 days after becoming aware of it and provide specified information.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: interviewed Director, Business Analyst Director. Documents: Standard Form Contract, Sample contracts		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
No customers were on a SFC. All customers were contracted before taking a supply of electricity so deeming conditions do not apply.		
Issues		
None		
Recommendations		
None		



3.14.3 Electricity Industry Act – Licence Conditions and Obligations

Item 101 Retail Licence condition 14.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, Documents: Compliance file. The licensee advised the ERA of the contract arrangements with the approval of the auditor.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted with the auditor in accordance with the requirements. The last audit was also conducted according to the requirements.		
Issues		
None		
Recommendations		
None		

Item 105 Retail Licence condition 4.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 17(1)</i> A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i> .		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, Documents: Licence invoices, Compliance spreadsheet.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has paid the annual prescribed licence fee as required for every year of operation. Following the previous Audit, the Licensee now requests the invoices directly from the ERA to ensure payment is made in accordance with the anniversary date. 2014 paid on 5th Nov 2014, 2015 paid on 17th Nov 2015, 2016 paid on 17 Nov 2016, 2017 paid on 1st Dec 2017. Anniversary date 21 November. Licence Standing Charges Quarterly payments were not due as the amounts were less than \$5/quarter and not invoiced by ERA.		
Issues		
None		
Recommendations		
None		

Item 106 Retail Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 31(3)</i>		



A Licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.

Observations

Documents ☐ Compliance ☐

Evidence: Interviewed Director, Business Analyst, Documents: Not Applicable

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

The onus on network availability lies with Western Power, not the electricity retailer. AER has no capacity to minimize the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.

Issues

None

Recommendations

None

Item 107 Retail Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 41(6)</i> A Licensee must pay the costs of taking an interest in land or an easement over land.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: Interviewed Director, Business Analyst, Documents: Not Applicable.		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
AER has no requirement for an interest in or an easement over land. There has been no land acquired compulsorily.		
Issues		
None		
Recommendations		
None		

Item 108 Retail Licence condition 24.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 54(1)</i> A retail or integrated regional licensee must not supply electricity to a small use customer otherwise than under a standard form contract or a non-standard form contract that complies with the Act.		
Observations		
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
Evidence: Interviewed Director, Business Analyst, Documents: Not Applicable.		
Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
All contracts are non-standard contracts that comply with the Act. The SFC has been approved by ERA.		
Issues		
None		
Recommendations		
None		



Item 109 Retail Licence condition 25.4	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Act section 54(2)</i> A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst, Documents: Not Applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The SFC amendments have been approved in accordance with the requirements.									
Issues									
None									
Recommendations									
None									

Item 110 Retail Licence condition 27.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Act section 76</i> If a designation under section 71(1) of the Electricity Industry Act is in force a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst, Documents: Not Applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no designation.									
Issues									
None									
Recommendations									
None									

Item 111 Retail Licence condition 21.1	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Act section 101</i> A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst, Documents: Ombudsman invoices/receipts.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



The Licensee is member of an approved scheme and there has been no decisions or directions by the electricity ombudsman to require action.

Issues

None

Recommendations

None

Item 113 Retail Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Act section 115(2)</i> A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst, Documents: NA.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no complaints about behaviour for the purpose of hindering or prohibiting access.									
Issues									
None									
Recommendations									
None									



3.14.1 Electricity Licences – Licence Conditions and Obligations

Item 114 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Retail Licence condition 23.1</i> A licensee must ensure that an electricity marketing agent of the licensee complies with the applicable codes.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee now has no marketing agents but marketing activities undertaken during the audit period complied with the Code.									
Issues									
None									
Recommendations									
None									

Item 115 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Retail Licence condition 23.2</i> The licensee must report a breach of the applicable code conditions by an electricity marketing agent to the ERA within the prescribed timeframe.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no breaches of the Code to report.									
Issues									
None									
Recommendations									
None									

Item 116 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Retail Licence condition 24.2</i> A licensee must, if directed by the ERA, review the standard form contract and submit to the ERA the results of that review within the time specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. ERA approval									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The SFC has been amended as required and approved by ERA.									
Issues									
None									
Recommendations									



None		
Item 117 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Retail Licence condition 24.3</i> A licensee must comply with any direction given by the ERA in relation to the scope, process and methodology of the standard form contract review.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents not applicable		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The SFC has been amended as required and approved by ERA.		
Issues		
None		
Recommendations		
None		

Item 118 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Retail Licence condition 25.1</i> A licensee can only amend the standard form contract with the ERA's approval.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents SFC		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The SFC has been amended as required and approved by ERA.		
Issues		
None		
Recommendations		
None		

Item 119 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Retail Licence condition 12.1</i> A Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents Financial accountants letter on accounting standards		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee complies with Australian accounting standards. The Licensee is not a reporting body to ASIC so do not have to meet listed company standards.		
Issues		
None.		



Recommendations
None

Item 120 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Retail Licence condition 13.4</i> A Licensee must comply with any individual performance standards prescribed by the ERA.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, Documents: Not applicable.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no individual performance standards.		
Issues		
None		
Recommendations		
None		

Item 121 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Retail Licence condition 14.2</i> A Licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for the performance audit.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, Documents: The Licensee provided contracting arrangements to the ERA with the approval of the auditor. Compliance file		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted with the auditor in accordance with the requirements. The last audit complied with the requirements.		
Issues		
None		
Recommendations		
None		

Item 123 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Retail Licence condition 15.1</i> A Licensee must report to the ERA, in the manner prescribed, if a Licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a Licensee's ability to meet its obligations.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, listed staff on site. Documents: Retail licence.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>



The Licensee is not under external administration nor was there a significant change in the circumstances upon which the licence was granted.

Issues

None

Recommendations

None

Item 124 Electricity Industry Act section 11	Adequacy of controls rating B	Compliance rating 2							
Licence: <i>Retail</i>									
<i>Retail Licence condition 16.1</i> A Licensee must provide the ERA, in the manner prescribed, any information the ERA requires in connection with its functions under the Electricity Industry Act.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst, Director. Documents: Annual returns.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The annual compliance reports were completed but the 2017 report was late. The annual performance reports were provided to ERA on the due date. They were published on the website by the required date. As Licence Standing Charges quarterly payments were not due they were not reportable as a non-compliance.									
The Licensee was also late (by four days) in providing to the ERA data requested in 2016.									
Issues									
Late report.									
Recommendations									
Improve control processes to ensure that reports are submitted on time.									

Item 125 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Retail Licence condition 17.1&17.2</i> A Licensee must publish any information it is directed by the ERA to publish, within the timeframes specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Not applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The performance report was published and on time.									
Issues									
None									
Recommendations									
None									

Item 126 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Retail Licence condition 18.1</i>		



All notices must be in writing, unless otherwise specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Sample communication with ERA. Compliance spreadsheet.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The ERA did not require any notices. All material communication with the ERA is in writing.									
Issues									
None									
Recommendations									
None									





3.14.1 Electricity Industry Code of Conduct – Licence Conditions and Obligations (all licence conditions Electricity Industry Act s82 and Licence clause 23.1)

Marketing

Item 129 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
<i>Code of Conduct clause 2.1</i> A retailer must ensure that its electricity marketing agents comply with Part 2 of the Code of Conduct.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Marketing Policy									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has no marketing agents now but during audit period had marketing agents and all marketing activities comply. There have been no complaints.									
Issues									
None									
Recommendations									
None									

Item 130 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 2.2(1)</i> A retailer or electricity marketing agent must ensure that standard form contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 2.2(1).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample contracts									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no customers on a SFC. There have been no complaints.									
Issues									
None									
Recommendations									
None									

Item 131 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated	
Licence: Retail			
<i>Code of Conduct clause 2.2(2)</i> Subject to subclause 2.2(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 2.2(2) no later than on, or with, the customer's first bill.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no customers on a SFC. There have been no complaints.									
Issues									
None									
Recommendations									
None									

Item 132 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 2.3(1)</i> A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 2.3(1).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Non-standard contract									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The copy of the signed contract has been given to the customer within 1 business day. Verifiable consent has been retained.									
Issues									
None									
Recommendations									
None									

Item 133 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 2.3(2)</i> A retailer or electricity marketing agent must ensure that the information specified in subclause 2.3(2) is provided to the customer before entering into a non-standard contract.									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: non-standard contract									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The required information is given to new customers before entering the contract.									
Issues									
None									
Recommendations									
None									

Item 135 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1	
Licence: <i>Retail</i>			
<i>Code of Conduct clause 2.3(5)</i> Subject to subclause 2.3(3), a retailer or electricity marketing agent must obtain the customer's verifiable consent that the specified information in subclause 2.3(2) and 2.3(4), as applicable, has been provided.			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



Evidence: Interviewed Director, Business Analyst. Documents: non-standard contract.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Verifiable consent has been retained.									
Issues									
None									
Recommendations									
None									

Item 137 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 2.4(2)</i> A retailer or electricity marketing agent must provide contact details, including a telephone number, to a customer and ensure that the customer is able to contact the retailer or electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: marketing policy, ID cards, business cards									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The required information is given to new customers when entering the contract to allow the customer to contact the retailer during normal business hours for the purposes of enquiries, verifications and complaints.									
Issues									
None									
Recommendations									
None									

Item 138 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 2.5(1)</i> A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: welcome pack									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no request.									
Issues									
None									
Recommendations									
None									

Item 139 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		

**Code of Conduct clause 2.5(2)**

A retailer or electricity marketing agent who meets with a customer face to face must:

- wear a clearly visible and legible identity card showing the information specified in subclause 2.5(2)(a); and
- provide the written information specified in subclause 2.5(2)(b) as soon as practicable following a request by the customer.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: business card, ID card, marketing policy

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The required information for 2.5(2)(a) is on the business card/ID card. The procedures require giving the business card and those examined carried their cards. There was no request so the information in 2.5(2)(b) is Not performed/Not rated.

Issues

None

Recommendations

None

Item 140

Electricity Industry Act Code of Conduct

Adequacy of controls
rating
A

Compliance rating

1

Licence: Retail

Code of Conduct clause 2.6

A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left at the premises.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: business card/ID card, marketing policy

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Licensee did not canvass individuals who have signage stating they do not wish to be canvassed. Also, marketing materials are not left at premises which state that no marketing materials are accepted. There have been no complaints.

Issues

None

Recommendations

None

Item 141

Electricity Industry Act Code of Conduct

Adequacy of controls
rating
Not performed

Compliance rating

Not Rated

Licence: Retail

Code of Conduct clause 2.9

An electricity marketing agent must keep a record of complaints from customers or persons who are contacted by, or on behalf of, the electricity marketing agent for the purposes of marketing; and provide the electricity ombudsman with all of the information that it has relating to a complaint, within 28 days of receiving a request for that information.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: NA



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no complaints to record and no request for information from the Ombudsman.									
Issues									
None									
Recommendations									
None									

Item 142 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 2.10</i> An electricity marketing agent must keep a record, or other information, required under the Code for at least 2 years after the last time that a customer or person was contacted by, or on behalf of, the electricity marketing agent, or after receipt of the last contact from, or on behalf of, the electricity marketing agent, whichever is later.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no records or other information to be recorded and retained. There is a retention policy to retain all record and information perpetually. There have been no marketing agents in the last 2 years.									
Issues									
None									
Recommendations									
None									

Connection

Item 143 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 3.1(1)</i> If a retailer agrees to sell electricity 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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no connections with all customers transferred.									
Issues									
None									
Recommendations									
None									



Item 144 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 3.1(2)</i> 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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no connections with all customers transferred.		
Issues		
None		
Recommendations		
None		

Billing

Item 145 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.1</i> A retailer must issue a bill no more than once a month and at least once every 3 months, except for the circumstances specified in subclause 4.1.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: Identity card		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Bills are issued monthly and no more frequently.		
Issues		
None		
Recommendations		
None		

Item 146 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.2(1)</i> For the purposes of subclause 4.1(a)(ii), a retailer has given a customer notice if, prior to placing a customer on a shortened billing cycle, the retailer advises the customer of the information specified in subclause 4.2(1).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no customers on a shortened billing cycle. There are no residential customers.		



Issues
None
Recommendations
None

Item 148 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 4.2(3)</i> A retailer must give a customer written notice of a decision to shorten the customer's billing cycle within 10 business days of making the decision.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no customers on a shortened billing cycle.									
Issues									
None									
Recommendations									
None									

Item 149 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 4.2(4)</i> A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no customers on a shortened billing cycle.									
Issues									
None									
Recommendations									
None									

Item 150 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 4.2(5)</i> On request, a retailer must return a customer who is subject to a shortened billing cycle to the billing cycle that previously applied if the customer has paid 3 consecutive bills by the due date.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



There have been no customers on a shortened billing cycle.
Issues
None
Recommendations
None

Item 151 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.2(6)</i> A retailer must inform a customer, who is subject to a shortened billing cycle, at least every 3 months about the conditions upon which the customer can be returned to the previous billing cycle.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no customers on a shortened billing cycle.		
Issues		
None		
Recommendations		
None		

Item 152 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.3(1)</i> Notwithstanding clause 4.1, on receipt of a request by a customer, a retailer may provide the customer with a bill that reflects a bill-smoothing arrangement with respect to any 12-month period.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no customers on bill smoothing arrangement.		
Issues		
None		
Recommendations		
None		

Item 153 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.3(2)</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) are met.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>



Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no customers on a bill smoothing arrangement.									
Issues									
None									
Recommendations									
None									

Item 154 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.4</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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bills are sent to the supply address or the nominated other address or electronic address.									
Issues									
None									
Recommendations									
None									

Item 155 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.5(1)</i> A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer's bill, unless the customer agrees otherwise.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bills meet the requirements. Note items (b), (c), (j), (k) are not applicable.									
Issues									
None									
Recommendations									
None									

Item 156 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.5(3)</i> If a retailer identifies and wishes to bill a customer for a 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.		



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There no historical debts.									
Issues									
None									
Recommendations									
None									

Item 157 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.6(1)</i> A retailer must base a customer's bill on the following: <ul style="list-style-type: none">the distributor's or metering agent's reading of the meter at the customer's supply address;the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(b); orif the connection point is a Type 7 connection point, the procedure is set out in the metrology procedure or Metering Code, or as set out in any applicable law									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The bills are based on the the distributor's or metering agent's (Western Power) reading. There are no customers reading meters or Type 7 connection points.									
Issues									
None									
Recommendations									
None									

Item 158 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.7</i> Other than in respect of a Type 7 connection, a retailer must use its best endeavours to ensure that the meter reading data is obtained as frequently as required to prepare its bills.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The meters are read daily and supplied monthly by Western Power which is adequate for monthly bills.									
Issues									
None									
Recommendations									
None									



Item 159 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.8(1)</i> If a retailer is unable to reasonably base a bill on a reading of the meter, a retailer must give the customer an estimated bill.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There no estimated bills. If there were no meter reading there were no bills.		
Issues		
None		
Recommendations		
None		

Item 160 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.8(2)</i> In circumstances where a customer's bill is estimated, a retailer must clearly specify the information required under subclause 4.8(2).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There no estimated bills.		
Issues		
None		
Recommendations		
None		

Item 161 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.8(3)</i> On request, a retailer must inform a customer of the basis and the reason for the estimation.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There no estimated bills.		
Issues		
None		
Recommendations		
None		



Item 162 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.9</i> In accordance with clause 4.19, 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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There no estimated bills.		
Issues		
None		
Recommendations		
None		

Item 163 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.10</i> If a customer satisfies the requirements specified in subclause 4.10, a retailer must use its best endeavours to replace an estimated bill with a bill based on an actual reading.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There no estimated bills.		
Issues		
None		
Recommendations		
None		

Item 164 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.11(1)</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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no requests for meter tests.		
Issues		
None		
Recommendations		
None		



Item 165 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.11(2)</i> If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no requests for meter tests.		
Issues		
None		
Recommendations		
None		

Item 166 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.12(1)</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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Alternative tariffs have not been offered.		
Issues		
None		
Recommendations		
None		

Item 167 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.13</i> If a customer's electricity 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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Alternative tariffs have not been offered.		
Issues		



None
Recommendations
None

Item 168 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.14(1)</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.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample bills		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No final bills have been requested. Final bills have been issued when churned (transferred) out.		
Issues		
None		
Recommendations		
None		

Item 169 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.14(2)</i> Subject to subclause 4.14(3), if a customer's account is in credit at the time of account closure, a retailer must, in accordance with the customer's instructions, transfer the amount of credit to another account that the customer has with the retailer or a bank account nominated by the customer, within 12 business days or other agreed time.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No accounts were in credit at time of account closure.		
Issues		
None		
Recommendations		
None		

Item 170 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.14(3)</i> If a customer's account is in credit at the time of account closure and the customer owes a debt to a retailer, the retailer may use that credit to offset the debt owed to the retailer by giving the customer written notice. If any amount remains after the set off, the retailer must ask the customer for instructions to transfer the remaining amount in accordance with subclause 4.14(2).		



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No accounts were in credit at time of account closure.									
Issues									
None									
Recommendations									
None									

Item 171 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.15</i> A retailer must review a customer's bill on request by the customer, subject to the customer paying that portion of the bill under review that the customer and a retailer agree is not in dispute, or an amount equal to the average amount of the customer's bill over the previous 12 months (excluding the bill in dispute, whichever is less), and paying any future bills that are properly due.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There was a request to review a bill and an error was found with Western Power providing incorrect data resulting in an overcharge.									
Issues									
None									
Recommendations									
None									

Item 172 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.16(1)(a)</i> If a retailer has reviewed a customer's bill and is satisfied that the bill is correct, the retailer may require the customer to pay the unpaid amount. The retailer must advise the customer that the customer may request for a meter test in accordance with the applicable law; and also, the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Request to review bill									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There was a request to review a bill and an error was found with Western Power providing incorrect data resulting in an overcharge, so there was no unpaid amount. The customer was advised of the right to complain but there were no complaints.									
Issues									
None									
Recommendations									
None									



Item 173 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.16(1)(b)</i> If a retailer has reviewed a customer's bill and is satisfied that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17 and 4.18.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There was a request to review a bill and an error was found with Western Power providing incorrect data resulting in an overcharge. The overcharged amount was credited to the next bill as requested by the customer. Code 4.18(2)(a).									
Issues									
None									
Recommendations									
None									

Item 174 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.16(2)</i> A retailer must inform a customer of the outcome of the review of a bill as soon as practicable.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There was a request to review a bill and an error was found with Western Power providing incorrect data resulting in an overcharge of which the customer was advised.									
Issues									
None									
Recommendations									
None									

Item 175 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.16(3)</i> If a retailer has not informed a customer of the outcome of the review of a bill within 20 business days from the date of receipt of the request for review, the retailer must provide the customer with notification of the status of the review as soon as practicable.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Advice of overcharge									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



There was a request to review a bill and an error was found with Western Power providing incorrect data resulting in an overcharge. The customer was informed in less than 3 business days of the outcome, so notification of status was not required..

Issues

None

Recommendations

None

Item 176 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.17(2)</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), a retailer must do so in the manner specified.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no amounts undercharged.									
Issues									
None									
Recommendations									
None									

Item 176A Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.17(3)</i> A retailer may charge a customer interest on the undercharged amount or require the customer to pay a late fee, if the conditions in clause 4.17(3) are met.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no amounts undercharged.									
Issues									
None									
Recommendations									
None									

Item 177 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.18(2)</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 within 10 business days of the retailer becoming aware of the error, defect, or default. Subject to sub-clauses 4.18(6) and 4.18(7), the retailer must ask the customer for instructions if the amount should be credited to the customer's account or repaid to the customer directly.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Review advice									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The amounts overcharged was credit to next bill as requested by customer. The customer was informed within 10 days.									
Issues									
None									
Recommendations									
None									

Item 178 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.18(3)</i> A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: review advice									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee credited the overcharge to the next bill as requested by the customer within 3 days. Credit rather than a payment was requested.									
Issues									
None									
Recommendations									
None									

Item 179 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.18(4)</i> If instructions regarding repayment of an overcharged bill are not received within 20 business days of a retailer making the request, a retailer must use reasonable endeavours to credit the amount overcharged to a customer's account.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Review advice									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The instructions were received in less than 20 business days.									
Issues									
None									
Recommendations									
None									



Item 180 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.18(6)</i> Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
The amount was greater than \$100.		
Issues		
None		
Recommendations		
None		

Item 181 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.18(7)</i> A retailer may, by giving the customer written notice, use an amount overcharged to set off a debt owed to the retailer, provided that the customer is not a residential customer experiencing payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with the amount of credit in accordance with sub-clauses 4.18(2) or 4.18(6), as applicable.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There have been no set offs.		
Issues		
None		
Recommendations		
None		

Item 182 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.19(1)</i> If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of a customer, the retailer must comply with subclause 4.19(1).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There have been no adjustments.		
Issues		
None		



Recommendations		
None		

Item 183 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.19(2)</i> If the meter is read under either clause 4.6 or clause 4.3(2)(d), and the amount of the adjustment is an amount owing to the customer, the retailer must use its best endeavours to inform the customer within 10 business days and ask the customer for instructions about the repayment of the amount subject to sub-clauses 4.19(5) and 4.19(7).		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
There have been no adjustments.		
Issues		
None		
Recommendations		
None		

Item 184 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.19(3)</i> If a retailer receives 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.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
There have been no adjustments.		
Issues		
None		
Recommendations		
None		

Item 185 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 4.19(4)</i> If a retailer does not receive instructions under subclause 4.19(2), within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: Interviewed Director, Business Analyst. Documents: NA		



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no adjustments.									
Issues									
None									
Recommendations									
None									

Item 186 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 4.19(7)</i> A retailer may, after notifying the customer in writing, use an amount of an adjustment to set off that customer's debt owed to the retailer, provided that the customer is not a residential customer in payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with that amount in accordance with subclause 4.19(2) or, if the amount is less than \$100, subclause 4.19(5).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no adjustments.									
Issues									
None									
Recommendations									
None									

Payment

Item 187 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 5.1</i> The due date on a bill must be at least 12 business days from the dispatch date of that bill unless otherwise agreed with a customer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Sample Bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bills show due date of 14 days from the dispatch date as agreed by the customer.									
Issues									
None									
Recommendations									
None									

Item 188 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Code of Conduct clause 5.2</i>		



Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Sample Bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Methods(a), (b), (d) and (e) are offered. Method (c) does not apply as there are no residential customers. Payment by BPay is not offered in accordance with 1.10 of the Code.									
Issues									
None									
Recommendations									
None									

Item 189 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 5.3</i> Prior to commencing a direct debit facility, a retailer must obtain a customer's verifiable consent and agree with the customer the date of commencement of the facility and the frequency of the direct debits.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: sample verifiable consent and agreement to conditions.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The sample procedures showed compliance with the requirements. There are no customers with direct debit.									
Issues									
None									
Recommendations									
None									

Item 190 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 5.4</i> Upon request, a retailer must accept payment in advance from a customer. This will not require a retailer to credit any interest to the amounts paid in advance. Subject to clause 6.9, and unless otherwise agreed with a customer, the minimum amount for an advance payment that a retailer will accept is \$20.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Procedures Sample accounts									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Payment in advance is permitted but no customers pay in advance.									
Issues									
None									
Recommendations									
None									



Item 197 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
<i>Code of Conduct clause 5.7(1)</i> A retailer must not require a customer, who has vacated a supply address, to pay for electricity consumed at the customer's supply address in the circumstances specified in subclause 5.7(1).		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample account		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Customers do not pay for electricity consumed at the customer's supply address after the date of vacating.		
Issues		
None		
Recommendations		
None		

Item 198 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Code of Conduct clause 5.7(2)</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 the customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample account		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No customer was evicted or otherwise required to vacate a supply address.		
Issues		
None		
Recommendations		
None		

Item 199 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
<i>Code of Conduct clause 5.7(4)</i> Notwithstanding sub-clauses 5.7(1) and (2), a retailer must not require a previous customer to pay for electricity consumed at the supply address in the circumstances specified in subclause 5.7(4).		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample accounts		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Previous customers did not pay for electricity consumed at the supply address in the circumstances specified.		



Issues
None
Recommendations
None

Item 201 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Code of Conduct clause 5.8(2)</i> A retailer must not recover, or attempt to recover, a debt from a person relating to a supply address other than the customer who the retailer has, or had, entered into a contract for the supply of electricity to that supply address.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample accounts		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Only the customer as the contract holder of the supply address has paid for debts. Debt collectors have not been used.		
Issues		
None		
Recommendations		
None		

Item 201A Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 5.9</i> A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt and provided that the retailer obtains the other customer's verifiable consent to the transfer.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: sample accounts		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no request.		
Issues		
None		
Recommendations		
None		

Payment Difficulties and Financial Hardship

Item 228 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 6.11</i> A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.		



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no request.									
Issues									
None									
Recommendations									
None									

Disconnection

Item 229 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 7.1(1)</i> Prior to arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a reminder notice, which contains the information specified in subclause 7.1(1)(a), not less than 15 business days from the dispatch date of the bill. The retailer must use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and timeframes specified in subclause 7.1(1)(c).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections.									
Issues									
None									
Recommendations									
None									

Item 230 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 7.2(1)</i> A retailer must not arrange for a disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 7.2(1).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections.									
Issues									
None									
Recommendations									
None									



Item 232 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 7.4(1)</i> Unless the conditions specified in subclause 7.4(1) are satisfied, a retailer must not arrange for the disconnection of a customer's supply address for denying access to the meter.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disconnections.		
Issues		
None		
Recommendations		
None		

Item 234 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 7.6</i> Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in sub-clauses 7.6(1) - (2) when arranging for disconnection or disconnecting a customer's supply address.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disconnections.		
Issues		
None		
Recommendations		
None		

Reconnection

Item 242 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 8.1(1)</i> A retailer must arrange to reconnect a customer's supply address if the customer remedies their breach, makes a request for reconnection and pays the retailer's reasonable charges (if any) for reconnection, or accepts an offer of an instalment plan for the retailer's reasonable charges.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There were no disconnections to require re-connection.		
Issues		
None		



Recommendations	
None	

Item 243 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Code of Conduct clause 8.1(2)</i> A retailer must forward the request for reconnection to the relevant distributor within the timeframes specified in subclause 8.1(2).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There were no disconnections to require re-connection.		
Issues		
None		
Recommendations		
None		

Information & Communication

Item 272 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
<i>Code of Conduct clause 10.1(1)</i> A retailer must give notice of any variations in its tariffs to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: Sample bills		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>	
The bills show future CPI tariff increases.		
Issues		
None		
Recommendations		
None,		

Item 273 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Code of Conduct clause 10.1(2)</i> On request and at no charge, a retailer must provide a customer with reasonable information on its tariffs, including alternative tariffs.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There have been no requests.		



Issues
None
Recommendations
None

Item 274 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 10.1(3)</i> A retailer must give a customer the information requested on tariffs within 8 business days of the date of receipt and, if requested, provide the information in writing.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 280 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 10.3A</i> At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 of this Code and under any other legislation in Western Australia, including the amount of the payment and the eligibility criteria for the payment.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: notice of service standard payments									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no disconnections nor reconnections nor complaints and there is a notice given customers about service standard payments annually.									
Issues									
None.									
Recommendations									
None.									

Item 281 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 10.4</i> On request and at no charge, a retailer must give, or make available to, a customer general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.		



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 282 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 10.5</i> If asked by a customer for information relating to the distribution of electricity, a retailer must give the information to the customer or refer the customer to the relevant distributor for a response.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 290 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 10.9</i> To the extent practicable, a retailer and distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format, that is easy to understand.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Standard form contract, non-standard contract									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The sample contract documents comply.									
Issues									
None									
Recommendations									
None									



Item 291 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Code of Conduct clause 10.10(1)</i> On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no requests. The Code is at the office.		
Issues		
None		
Recommendations		
None		

Item 292 Electricity Industry Act Code of Conduct	Adequacy of controls rating B	Compliance rating 2
Licence: Retail		
<i>Code of Conduct clause 10.10(2)</i> A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Code was not on the web site but is now.		
Issues		
Code not on web site		
Recommendations		
The Code is now on the website.		

Item 297 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Code of Conduct clause 10.12(2)</i> On request, a retailer must advise a customer of the availability of different types of meters or refer the customer to the relevant distributor for a response.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no requests.		
Issues		
None		
Recommendations		
None		



Complaints and Dispute Resolution

Item 298 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 12.1(1)</i> A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Complaints process and manual									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee has a complaints process and manual. The ERA has approved the process.									
Issues									
None									
Recommendations									
None									

Item 299 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 12.1(2)</i> The complaints handling process under subclause 12.1(1) must comply with the requirements specified in subclauses 12.1(2)(a), (b) and (c) and be made available at no cost.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Complaints process and manual									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The complaints process complies and is available at no cost.									
Issues									
None									
Recommendations									
None									

Item 300 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Code of Conduct clause 12.1(3)</i> A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no complaints.									
Issues									
None									



Recommendations									
None									

Item 301 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 12.1(4)</i> On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no complaints.									
Issues									
None									
Recommendations									
None									

Item 302 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
<i>Code of Conduct clause 12.2</i> A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Complaints process and manual									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The complaints process complies with ERA guidelines.									
Issues									
None									
Recommendations									
None									

Item 303 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 12.3</i> On request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer to utilise the respective complaints handling processes.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed: Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests nor complaints.									



Issues
None
Recommendations
None

Item 304 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
<i>Code of Conduct clause 12.4</i> When a retailer, distributor or electricity 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 appropriate to deal with the complaint (if known).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: NA									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no complaints.									
Issues									
None									
Recommendations									
None									

Reporting

Item 305 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
<i>Code of Conduct clause 13.1</i> A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: compliance reports, performance report									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The reports were prepared in accordance with the requirements.									
Issues									
None									
Recommendations									
None.									

Item 306 Electricity Industry Act Code of Conduct	Adequacy of controls rating B	Compliance rating 2
Licence: Retail		
<i>Code of Conduct clause 13.2</i> The report specified in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.		
Observations		



Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: Interviewed Director, Business Analyst. Documents: performance report				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The reports were prepared in accordance with the requirements. The compliance reports for 2014/15, 2015/16 and the performance report were on time. The 2016/17 compliance report was late.				
Issues				
Report on time				
Recommendations				
Improve controls to ensure reporting on time.				

Item 307 Electricity Industry Act Code of Conduct	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Code of Conduct clause 13.3</i> The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: <ul style="list-style-type: none">• copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and• a copy is posted on the retailer or distributor's website.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: performance report		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The report was published in accordance with the requirements. It is available at the office and on the website by the due date.		
Issues		
None		
Recommendations		
None		

Service standard payments

Item 308 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 14.1(1)</i> Subject to clause 14.6, a retailer must pay the stated compensation to a customer if the customer is not reconnected in accordance with the timeframes specified in Part 8.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no reconnections.		
Issues		
None		
Recommendations		
None		



Item 310 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 14.2(1)</i> Subject to clause 14.6, a retailer must pay the specified compensation to a customer if a retailer fails to comply with any of the procedures specified in Part 6 and Part 7 prior to arranging for disconnection or disconnecting the customer for failure to pay a bill or arranges for disconnection or disconnects the customer for failure to pay a bill in contravention of clauses 7.2, 7.3, 7.6 or 7.7.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disconnections.		
Issues		
None		
Recommendations		
None		

Item 312 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 14.3(1)</i> Subject to clause 14.6, a retailer must pay the customer \$20 if the retailer has failed to acknowledge or respond to a complaint within the timeframes prescribed in subclause 12.1(4).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no complaints		
Issues		
None		
Recommendations		
None		

Item 315 Electricity Industry Act Code of Conduct	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Code of Conduct clause 14.7(1)</i> A retailer that is required to make a compensation payment for failing to satisfy a service standard under clauses 14.1, 14.2 or 14.3 must do so in the manner specified in subclause 14.7(1).		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: NA		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no service standard breaches to require payment.		
Issues		
None		



Recommendations
None





3.14.2 Electricity Industry Metering Code – Licence Conditions and Obligations (all licence condition Licence clause 5.1)

Item 324 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 3.3B</i> A user who is aware of bi-directional flows at a metering point 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 must notify the network operator within 2 business days.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst, Documents: The Licensee has no meters. Some customers have bi directional meters		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
For all customers installing solar systems AER have worked to ensure their meter has been bidirectional enabled. The retailers are notified in the approval to connect to the network.		
Issues		
None		
Recommendations		
None		

Item 339 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 3.11(3)</i> A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee is not aware of any outages. The meter reading verification process showed no outages.		
Issues		
None		
Recommendations		
None		

Item 364 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 3.27</i> A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The retailer has not installed any meters. As a retailer, all metering installations are requested through Western Power who then engages its staff to conduct any necessary works. The retailer's metering agent is Western Power so it is unnecessary for the retailer to conduct any physical metering works (installation, upgrades, etc).									
Issues									
None									
Recommendations									
None									

Item 371 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 4.4(1)</i> If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no advice of a meter discrepancy and no corrected data provided.									
Issues									
None									
Recommendations									
None									

Item 372 Licence condition 5.1	Adequacy of controls rating A	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 4.5(1)</i> A Code participant must not knowingly permit the registry to be materially inaccurate.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has no knowledge of inaccuracies in Western Power's registry. The Licensee's details have not changed.									
Issues									
None									
Recommendations									
None									

Item 373 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 4.5(2)</i>		



If a Code participant (other than a network operator) becomes aware of a change to or an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.

Observations

Documents ☐ Compliance ☐

Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

The licensee is not aware of any inaccuracies in an item of standing data in the registry.

Issues

None

Recommendations

None

Item 388 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Retail*

Electricity Industry Metering Code clause 5.4(2)

A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation under subclause 5.4(1).

Observations

Documents ☒ Compliance ☒

Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐

No requests were made of users or the Licensee.

Issues

None

Recommendations

None

Item 401 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Retail*

Electricity Industry Metering Code clause 5.16

If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.

Observations

Documents ☒ Compliance ☒

Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process ☒ Outcome ☒ Output ☒ Reporting ☒ Compliance ☒

The retailer has no physical role in respect of metering.

Issues

None

Recommendations

None



Item 402 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 5.17(1)</i> A user must provide standing data and validated and where necessary substituted or estimated energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no meters to collect information or data from for billing. (Meters are the Network Operators under the Meter Code). The retailer is obligated to supply meter data to the customer on request and at no charge and would do so if there were any requests.		
Issues		
None		
Recommendations		
None		

Item 405 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 5.18</i> If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no change in energisation status. The retailer has no physical role in respect of metering.		
Issues		
None		
Recommendations		
None		

Item 406 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 5.19(1)</i> A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>



Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 407 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	<input type="checkbox"/>
The only connection points are with Western Power. There has been no request to collect and maintain a record of the address, site and customer attributes other than that provided at transfer. This information is collected by Western Power and the retailer takes it on trust unless there is a manifest error.		
Issues		
None		
Recommendations		
None		

Item 408 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 5.19(3)</i> Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	<input type="checkbox"/>
The only connection points are with Western Power and the Licensee is not aware of any changes in attributes.		
Issues		
None		
Recommendations		
None		



Item 410 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters. Email sighted.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Western Power sends by email a notice of changed Standing Data attributes, which the licensee acknowledges without further correspondence to Western Power.									
Issues									
None									
Recommendations									
None									

Item 416 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
A retailer may request a test only if at the time of the request it is the incumbent retailer. AER has made no such requests.									
Issues									
None									
Recommendations									
None									

Item 417 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



A retailer may request a test only if at the time of the request it is the incumbent retailer. AER has made no such requests.

Issues

None

Recommendations

None

Item 435 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.27</i> Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: Not Applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests. This information is collected by Western Power and the retailer takes it on trust unless there is a manifest error.									
Issues									
None									
Recommendations									
None									

Item 448 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 6.1(2)</i> A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has an ETAC and has complied with rules, procedures, agreements and criteria prescribed. The Licensee uses only the Western Power portal to make all metering transactions and thus meet compliance with Western Power's rules, procedures, agreements and criteria and further there have been no complaints.									
Issues									
None									
Recommendations									
None									

Item 451 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 7.2(1)</i>		



Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Western Power has the Licensee's relevant addresses and telephone number.

Issues

None

Recommendations

None

Item 453

Licence condition 5.1

Adequacy of controls
rating
Not Performed

Compliance rating
Not Rated

Licence: *Retail*

Electricity Industry Metering Code clause 7.2(4)

If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Western Power has the Licensee's relevant addresses. There was no request in the audit period.

Issues

None

Recommendations

None

Item 454

Licence condition 5.1

Adequacy of controls
rating
Not Performed

Compliance rating
Not Rated

Licence: *Retail*

Electricity Industry Metering Code clause 7.2(5)

A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no address changes.

Issues

None

Recommendations

None



Item 455 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no disclosure of confidential information.									
Issues									
None									
Recommendations									
None									

Item 456 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 7.6(1)</i> A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no confidential information to be disclosed.									
Issues									
None									
Recommendations									
None									

Item 457 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 8.1(1)</i> If any dispute arises between any Code participants then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).									



Issues
None
Recommendations
None

Item 458 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 8.1(2)</i> If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									

Item 459 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 8.1(3)</i> If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									

Item 460 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 8.1(4)</i> If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Director, Business Analyst. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									

Item 461 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 8.3(2)</i> The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: Interviewed Director, Business Analyst. Documents: There have been no disputes (the Licensee has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									