



Post-Audit Implementation Plan

Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
1/2019	<p>A/2 Obligation 74: <i>Energy Coordination (Customer Contracts) Regulations 2004</i> reg. 20(3) & 48</p> <p>There is no reference in the Non-Standard Contract to the requirement that Alinta Energy must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.</p>	Alinta Energy should update its Non-Standard Contract to include reference to the requirement that Alinta Energy must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.	Alinta Energy will update its Non-Standard Contract to include the required reference.	Legal Advisor	30 Jun 2020
2/2019	<p>A/2 Obligation 80: <i>Energy Coordination (Customer Contracts) Regulations 2004</i> reg. 44</p> <p>There is no reference in the Non-Standard Contract to the issuing of a notice in writing to a customer not more than 2 months and not less than one month before the day on which the contract is due to expire (or at the commencement of the contract if the contract is less than 1 month)</p>	Alinta Energy should update its Non-Standard Contract to include reference to the requirement that Alinta Energy must, when a non-standard contract is due to expire, issue a notice in writing to a customer not more than 2 months and not less than one month before the day on which the contract is due to expire (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.	Alinta Energy will update its Non-Standard Contract to include the required reference.	Legal Advisor	30 Jun 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
	with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.				
3/2019	<p>B/2 Obligation 82: <i>Energy Coordination (Customer Contracts) Regulations 2004</i> reg. 45(2)</p> <p>Alinta Energy does not include information from time to time on its bill informing the customer that the customer service charter is available free of charge.</p>	Alinta Energy should update its billing template to provide the customer advice that the customer service charter is available free of charge.	Alinta Energy will update the "Important Information" section of its billing template to advise customers that the Gas Customer Service Charter is available on its website.	Manager Regulatory Compliance	31 Mar 2020
4/2019	<p>C/1 Obligations 124, 125 & 126: <i>Gas Marketing Code of Conduct</i> cl. 2.5(1), 2.5(2) & 2.6</p> <p>Alinta Energy does not maintain sufficient oversight of training provided to external marketing agents.</p> <p>Training material does not explicitly include references to canvassing and advertising material.</p>	<p>Alinta Energy should increase its level of oversight and involvement with external marketing agents to obtain greater assurance of compliance, including by:</p> <ol style="list-style-type: none"> 1) Maintaining its own training register; 2) Developing and maintaining its own list of authorised agents and ensuring ID badges are appropriately retained; 3) Performing daily checks to ensure marketing agents are wearing ID badges as required; 4) Updating training material to explicitly include instructions concerning canvassing and advertising material. 	<p>Alinta Energy will develop a process for maintaining better oversight of external marketing agents.</p> <p>Alinta Energy will update training material to include specific references to canvassing and advertising material. Training material will be signed off by Legal and Regulatory before being delivered.</p>	WA Sales Manager	31 Mar 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
5/2019	<p>B/2 Obligation 136: <i>Compendium of Gas Customer Licence Obligations</i> cl. 4.1(a) Billing return codes for bills that are issued more than once a month are not set to align with the required timeframes.</p>	Alinta Energy should improve its billing processes by aligning billing return codes for quarterly accounts from 20 days to 30 days.	Alinta Energy will work with Fuji Xerox to amend billing return codes for quarterly accounts such that bills issued within 30 days (with the exception of final bills or if metering data is received for the purposes of preparing the customer's next bill) are flagged for review.	Team Leader Billing	31 Mar 2020
6/2019	<p>B/2 Obligation 137: <i>Compendium of Gas Customer Licence Obligations</i> cl. 4.1(b) Alinta Energy continues to issue a small number of bills (approximately 0.5%) outside the prescribed 105-day timeframe.</p>	Alinta Energy should update billing return codes for quarterly accounts from 120 days to 105 days.	<p>Alinta Energy will work with Fuji Xerox to amend billing return codes for quarterly accounts from 120 days to 105 days.</p> <p>Alinta Energy will also review its billing processes to determine other approaches for reducing the number of bills issued outside the 105-day period.</p>	Team Leader Billing	31 Mar 2020
7/2019	<p>B/2 Obligation 153: <i>Compendium of Gas Customer Licence Obligations</i> cl. 4.7(2) For a small number of customers, actual metering data is not obtained at least once a year as required.</p>	Alinta Energy should consider additional means of communication with customers (e.g. telephone calls) to assist ATCO Gas to access a customer's property to perform a meter read at least once a year.	Alinta Energy will continue to assist ATCO Gas to obtain meter readings as required by sending letters to customers and will consider additional means of communication.	Team Leader Billing	30 Jun 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
8/2019	<p>C/3</p> <p>Obligations 165 & 165A: <i>Compendium of Gas Customer Licence Obligations</i> cl. 4.14(2) & 4.14(3)</p> <p>If a customer's final bill is in credit, Alinta Energy does not contact the customer for instructions on transferring the amount in credit.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Create a more robust process around the closure of customer accounts to ensure customers are contacted for instructions on where to transfer credit amounts at the time of final bill; and 2) Include information regarding available account credits on the customer's final bill. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> 1) Update its final bill processes to ensure customers are contacted for instructions on where to transfer credit amounts at the time of final bill; and 2) Include information regarding available account credits on the customer's final bill. 	<p>Manager Customer Operations</p>	<p>30 Jun 2020</p>
9/2019	<p>C/NR</p> <p>Obligations 198: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.1(1)</p> <p>Alinta Energy is unable to readily identify (i) all customers who have had a financial hardship assessment conducted (ii) whether customers who have been referred to the relevant consumer representative have been referred within the required timeframe.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Develop and maintain a record of all customers who have informed the retailer of payment difficulties and had an assessment on financial status performed; and 2) Explore system limitations of adding payment difficulties information to customer accounts to ensure data can be readily provided on request. 	<p>Alinta Energy will review its systems to consider whether they can be enhanced to:</p> <ol style="list-style-type: none"> 1) Readily identify all customers who make contact concerning a hardship assessment, including those who are identified as not meeting the hardship criteria; and 2) Capture information to ensure all data can be provided on request, including data on customers that require referral to a relevant consumer representative to ensure timeframes are met. 	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
10/2019	<p>C/NR</p> <p>Obligations 199: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.1(3)</p> <p>Alinta Energy is unable to readily identify (i) all customers who have had a financial hardship assessment conducted (ii) whether customers who have been referred to the relevant consumer representative have been referred within the required timeframe.</p>	<p>Alinta Energy should amend process documentation to:</p> <ol style="list-style-type: none"> 1) Formalise the requirement to reasonably consider all information obtained in the assessment of a customer's financial situation; 2) State this information must be recorded against the customer's account; and 3) Explore system limitations concerning adding payment difficulties information to customer accounts to ensure data can be readily provided on request. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> i) Update process documentation to ensure all assessment instructions are included and there are directions on what information needs to be recorded for each assessment and where this should be recorded; ii) Update processes so information about an assessment is recorded against a customer's account, including when the customer is referred to a relevant consumer representative. 	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
11/2019	<p>C/NR</p> <p>Obligation 200: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.1(4)</p> <p>Alinta Energy cannot readily identify customers who have had a financial hardship assessment conducted.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Establish a standardised process through which customers can be advised of the details of their financial assessment upon request. This should include: developing formal scripting; updating processes for recording information about an assessment; establishing an assessment template that can be provided to a customer upon request; preparing training documentation; and 2) Explore system limitations and the applicability of adding financial hardship assessments within customer accounts so data can readily be provided upon request. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> (i) Develop formal scripting for financial assessments; (ii) Update processes so information about an assessment is recorded against a customer's account, including when the customer does not meet the payment difficulties or financial hardship criteria, so it can be provided to the customer upon request; (iii) Establish an assessment template that can be provided to a customer in written form upon request; and (iv) Prepare and deliver training as required. 	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
12/2019	<p>C/NR Obligations 200A, 201 & 202: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.2(1), (2) & (3)</p> <p>Alinta Energy's systems cannot readily identify customers who have had their account action temporarily suspended for at least 15 business days to allow for a financial assessment by a relevant consumer representative.</p>	<p>Alinta Energy should explore system limitations to determine whether accounts suspended temporarily to enable financial assessment by a relevant consumer representative can be readily identified.</p>	<p>Alinta Energy will update its processes so information concerning any account suspended temporarily to enable financial assessment is recorded against the customer's account.</p>	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>
13/2019	<p>C/NR Obligation 203: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.2(4)</p> <p>Alinta Energy's systems cannot readily identify customers who require additional time for a relevant consumer representative to complete a financial assessment.</p>	<p>Alinta Energy should explore system limitations to determine whether accounts suspended temporarily to enable financial assessment by a relevant consumer representative and where more time is requested by the customer to complete the assessment, can be readily identified.</p>	<p>Alinta Energy will update its processes so information concerning any account suspended temporarily to enable financial assessment and where more time is requested by the customer to complete the assessment, is recorded against the customer's account.</p>	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
14/2019	<p>C/NR Obligations 204 & 205: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.3(1) & 6.4(1) Alinta Energy was unable to demonstrate that the specified payment options are offered to customers identified as experiencing payment difficulties or being in financial hardship.</p>	<p>Alinta Energy should update its work instructions and supporting task flows for all payment arrangements offered to eligible customers.</p>	<p>Alinta Energy will update work instructions to ensure the specified payment options are offered to eligible customers.</p>	<p>Manager Customer Operations & Manager Customer Service</p>	<p>31 Mar 2020</p>
15/2019	<p>C/1 Obligation 206: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.4(2) Alinta Energy does not consistently provide customers in writing or by electronic means the information concerning their instalment plan.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Establish a consistent process for providing, within 5 business days and in writing or by electronic means, information to customers entering or amending instalment plans; and 2) Explore system limitations to consider whether enhancements can be made to provide comfort with regard to instalment plan obligations. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> (i) Ensure the hardship program welcome letter includes the required information and is sent to all customers who enter the financial hardship program or amending their instalment plan within 5 business days; and (ii) Review its systems to consider whether they can be enhanced to readily capture information concerning instalment plan obligations. 	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
16/2019	<p>C/NR Obligation 206A: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.4(3) Alinta Energy does not consistently provide customers within 5 business days, either in writing or by electronic means, the information concerning their instalment plan.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Establish a consistent process for providing, within 5 business days and in writing or by electronic means, information to customers entering or amending instalment plans; and 2) System limitations should be explored to consider whether enhancements can be made to provide comfort with regard to instalment plan obligations. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> 1) Ensure all customers entering or amending an instalment plan are sent information within 5 business days in writing or by electronic means; and 2) Explore system limitations to see whether enhancements can be made to provide comfort with regard to instalment plan obligations. 	<p>Manager Customer Operations & Manager Customer Service</p>	30 Jun 2020
17/2019	<p>C/NR Obligation 207: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.4(4) Alinta Energy was unable to demonstrate that, for a customer who had two instalment plans cancelled for non-payment in the previous 12 months, a third instalment plan was offered if it was satisfied the customer would comply with the instalment plan.</p>	<p>Alinta Energy should explore system limitations to consider whether enhancements can be made so data concerning customers on instalment plans can be readily provided upon request.</p>	<p>Alinta Energy will review its systems to see whether enhancements can be made to readily capture data concerning customers on instalment plans.</p>	<p>Manager Customer Operations & Manager Customer Service</p>	30 Jun 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
18/2019	<p>C/NR</p> <p>Obligation 208: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.6(1)</p> <p>Alinta Energy was unable to demonstrate that, if a customer or a relevant consumer representative requested a reduction of the customer's fees, charges or debt, this was considered.</p>	<p>Alinta Energy should explore system limitations to consider whether enhancements can be made so data concerning requests for a reduction of fees, charges or debt can be readily provided upon request.</p>	<p>Alinta Energy will review its systems to see whether enhancements can be made to readily capture data concerning requests for a reduction of fees, charges or debt.</p>	<p>Manager Customer Operations & Manager Customer Service</p>	30 Jun 2020
19/2019	<p>C/NR</p> <p>Obligation 211: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.8</p> <p>Alinta Energy was unable to demonstrate that, if a customer is experiencing financial hardship, the customer is advised of all options available.</p>	<p>Alinta Energy should explore system limitations to consider whether customer or consumer representative requests can be added to an account to ensure data can be provided readily upon request.</p>	<p>Alinta Energy will:</p> <ul style="list-style-type: none"> (i) Update work instructions to ensure all options are advised to a customer experiencing financial hardship; and (ii) Review its systems to see whether enhancements can be made to readily capture customer hardship information. 	<p>Manager Customer Operations & Manager Customer Service</p>	30 Jun 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
20/2019	<p>C/NR</p> <p>Obligation 212: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.9(1)</p> <p>Alinta Energy was unable to demonstrate that it consulted with relevant consumer representatives concerning payment in advance amounts.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Document the circumstances in which minimum payment in advance amounts are established for residential customers experiencing payment difficulties or financial hardship, including the requirement to consult with relevant consumer representatives to provide assurance of the assessment; and 2) Explore system limitations to consider minimum payment in advance functionality to ensure data can be provided upon request. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> 1) Update work instructions concerning payment in advance amounts for customers experiencing payment difficulties and financial hardship; and 2) Review its systems to see whether enhancements can be made to readily capture payment in advance amounts. 	<p>Manager Customer Operations & Manager Customer Service</p>	<p>30 Jun 2020</p>

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
21/2019	<p>C/NR</p> <p>Obligation 221: <i>Compendium of Gas Customer Licence Obligations</i> cl. 6.11</p> <p>Alinta Energy's systems do not readily identify business customers experiencing payment difficulties.</p>	<p>Alinta Energy should:</p> <ol style="list-style-type: none"> 1) Update work instructions and process documentation to provide guidance to relevant staff to explicitly address the requirement to consider any reasonable request for alternative payment arrangements from a business customer experiencing payment difficulties and outline the alternative payment arrangements available; and 2) Explore system limitations to consider adding alternative payment arrangements for business customers to ensure data can be provided upon request. 	<p>Alinta Energy will:</p> <ol style="list-style-type: none"> 1) Update work instructions to guide staff concerning requests from business customers experiencing payment difficulties; and 2) Review its systems to see whether a flag can be added to readily identify business customers who have advised of payment difficulties. 	Manager Customer Operations	30 Jun 2020
22/2019	<p>B/2</p> <p>Obligation 250: <i>Compendium of Gas Customer Licence Obligations</i> cl. 10.11(2)</p> <p>TTY and interpreter services information is missing from reminder notices and disconnection warnings.</p>	<p>Alinta Energy should update templates for reminder notices and disconnection warnings to include TTY and interpreter information.</p>	<p>Alinta Energy will update reminder notices and disconnection warnings to include TTY and interpreter information.</p>	Customer Experiences Coordinator	31 Mar 2020

GTL9 Alinta Sales Pty Ltd – 2019 Post-Audit Implementation Plan



Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
23/2019	<p>C/3</p> <p>Obligation 281: <i>Compendium of Gas Customer Licence Obligations</i> cl. 13.1</p> <p>Sample testing of performance reporting data showed data could not be reconciled with the data reported annually to the ERA.</p>	<p>Alinta Energy should:</p> <ul style="list-style-type: none"> • Centralise data reporting to one team; • Create a process document for extraction of performance reporting data; <p>Ensure performance reporting data is retained and stored on the online document management system.</p>	<p>Alinta Energy will improve the data extraction and collation processes for its annual performance reporting requirements by:</p> <ul style="list-style-type: none"> (i) Centralising data reporting to the west coast IT team; (ii) Creating a process document for extracting the data required for performance reporting; (iii) Ensuring performance reporting data is retained and stored in a format that can be readily extracted and audited. 	Solutions Delivery Manager, West Coast Information Technology	30 Jun 2020