



Performance Audit Report

**Regional Power Corporation (Horizon Power)
Electricity Integrated Regional Licence (EIRL2)**



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Our ref Horizon Power Performance Audit

29 July 2020

Dear Krystal

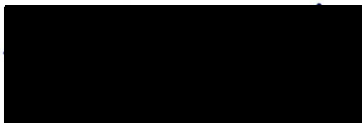
**Horizon Power – Electricity Integrated Regional License (EIRL 2) – 2020
Performance Audit Report**

We have completed the performance audit of Horizon Powers' EIRL2 for the period 1 April 2017 to 31 March 2020 and are pleased to submit our report to you.

I confirm that this report is an accurate presentation of the findings and conclusions from our audit procedures.

If you have any questions or wish to discuss anything raised in the report, please contact me on 9263 7271.

Yours sincerely



Travis McAuliffe
Partner

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Abbreviations

Abbreviation	Definition
AMI	Advanced Metering Infrastructure
Authority	Economic Regulation Authority
CAIDI	Customer Average Interruption Duration Index
Computershare	Computershare Utility Services Pty Ltd (i.e. Horizon Power's outsourced provider for Retail Customer Care Contact and Fault Call Centre and Billing and Collection Services)
CRN	Centrelink Reference Number
CS16	Horizon Power's document management system
CSR	Customer Service Representative
CURA	Horizon Power's risk management software
DoC	Department of Communities
EFT	Electronic Fund Transfer
ERA	Economic Regulation Authority
FCAWA	Financial Counsellor Association Western Australia
HUGS	Hardship Utility Grant Scheme
IMO	Independent Market Operator
mData21	Horizon Power's metering database system
MDR	Meter Data Repository
NMI	National Metering Identifier
NQRS	Network Quality and Reliability of Supply
NSC	Non-Standard Contract
OAG	The Office of the Auditor General
OCS	Outage Capture System
PUO	Public Utility Office
RCM	Horizon Power's Retail and Community Manager
REBS	Renewable Energy Buyback Scheme
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SCADA	Supervisory Control and Data Acquisition
SFC	Standard Form Contract
SFTP	Secure File Transfer Protocol
SGCIS	Smart Grid CIS
SQL	Structured Query Language
SSN-UIQ	Silver Spring Networks UtilityIQ
TTY	Teletypewriter
Velocity	Horizon Power's billing system
WACOSS	Western Australia Council of Social Services
WADCM	Western Australia Distribution and Connection Manual
WAER	Western Australia Electrical Requirement

WEM	Whole Electricity Market
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1. Independent Auditor's Report

Modified Conclusion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority (dated 1 April 2020), except for the effect of the issues set out in the Basis for Modified Conclusion section below, Regional Power Corporation ("Horizon Power") has complied, in all material respects, with the conditions of its Electricity Integrated Regional Licence (EIRL2) for the period 1 April 2017 to 31 March 2020.

Basis for modified conclusion

The Licence obligations listed on page 3 were assessed as non-compliant (rating 2, 3 or 4).

Scope

We have performed a reasonable assurance engagement over Horizon Power's compliance, in all material respects, with the performance criteria specified in its Electricity Integrated Regional Licence (EIRL2) (the "compliance requirements") throughout the period being 1 April 2017 to 31 March 2020 ("the specified period").

The assurance engagement was undertaken in accordance with the Economic Regulation Authority's ("the Authority") Audit and Review Guidelines: Electricity and Gas Licences March 2019 ("the Audit Guidelines")

The scope of the assurance work required relates to assessing Horizon Power's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Electricity Integrated Regional Licence (EIRL2) ("the Licence") issued under *Electricity Industry Act 2004 (WA)*.

Basis of Our Conclusion

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures

Our procedures consisted primarily of:

- Utilising the Audit Guidelines and the Electricity Compliance Reporting Manual 2016, 2017 and 2018 ("the Reporting Manual") as a guide for development of a risk assessment and document review to assess controls.
- Development of an Audit Plan for approval by the ERA and an associated work program, approved

by the ERA on 1 April 2020.

- Interviews with and representations from relevant Horizon Power staff to gain an understanding of process controls.
- Review of documents and walkthrough of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations.
- Sample testing or walkthroughs based on the sample size guide in the approved Audit Plan.

How We Define Reasonable Assurance and Material Non-Compliance

- Reasonable assurance is a high level of assurance, but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.
- Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of Horizon Power's compliance with the compliance requirements.

Inherent Limitations

- Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with the compliance requirements may occur and not be detected.
- A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for the Directors of Horizon Power for the purpose of assisting them to meet the compliance requirements of Section 13 of the *Electricity Industry Act 2004 (WA)* and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the Authority for the purpose of reporting on the reasonable assurance engagement for the Licence. We agree that a copy of this report may be provided to the Authority in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the Authority in relation to the report. We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Directors of Horizon Power, or for any other purpose other than that for which it was prepared.

Horizon Power's responsibility

Management are responsible for:

- the compliance activities undertaken to meet the requirements of the licence;
- identification of risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA;
- Implementing corrective actions for instances of non-compliance (if any).

KPMG's responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to Horizon Power's compliance with the compliance requirements of Section 13 of the *Electricity Industry Act 2004 (WA)* throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Accounting Professional and Ethical Standards Board, and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

Table of non-compliances:

Reporting Manual number and Licence obligation	Issue
Legislative Obligation 135: 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. <i>Code of Conduct, clause 2.3(5)</i> <i>Integrated Regional Licence, condition 6.3.1</i>	Details: Through enquiries with the Retail Services Manager and examination of the NSC call script, we noted Horizon Power have controls in place to ensure information is provided to customers prior to agreeing in entering into a NSC. The NSC call scripts state that the customer may cancel the non-standard agreement at any time during the cooling-off period after which the customer must provide verifiable consent. However, examination of the NSC call scripts noted that the information specified under sub clause 2(b)-(j) and sub clause 4 is provided to customers after verifiable consent has been obtained, namely: <ul style="list-style-type: none">• How the customer may obtain-<ul style="list-style-type: none">○ A copy of the Code; and○ Details on all relevant tariffs, fees, charges, alternative tariffs and service levels that may apply to the customer• The scope of the Code;• That a retailer and electricity marketing agent must comply with the Code;• How the retailer may assist if the customer is experiencing payment difficulties or financial hardship;• With respect to a residential customer, the concessions that may apply to the residential customer;• The distributor's 24 hour telephone number for faults and emergencies• How a residential customer may access Horizon Power's –<ul style="list-style-type: none">○ Multi-lingual services; and○ TTY services• How to make an enquiry of, or complaint to, the retailer; and• General information on the safe use of electricity. Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.
Legislative Obligation 145: 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 <i>Code of Conduct, clause 4.1</i>	Details: Through enquiries with the Retail Services Manager, we noted Horizon Power's Velocity system is encoded to ensure that customers are not billed more than once a month, and at least once every three months. The use of AMI meters ensures that reads are made multiple times throughout the day, and uploaded to Velocity from mData21. Examination of Compliance reports for 2017/2018 and 2018/2019 indicated that Horizon Power had reported two instances in 2017/18 and four instances in 2018/19 where customers had not been invoiced within the required 90 days period. The breaches during the 2018/2019 period predominantly related to human errors when setting up the customer accounts. The issue was resolved in the Velocity system through a program fix to repair records within mData21 and all customers were invoiced as soon as the program fix was implemented as well as offered additional time to pay. Since February 2019, Horizon Power have further strengthened their controls through monitoring daily automated unbilled reports and weekly reporting of potential breaches.

Reporting Manual number and Licence obligation	Issue
	Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.
<p>Legislative Obligation 196:</p> <p>If a residential customer has been assessed as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to this customer's last bill prior to the assessment being made.</p> <p><i>Code of Conduct, clause 5.6(5)</i></p>	<p>Details:</p> <p>Through enquiries with the Retail Services Manager, we noted where a customer is assessed as being in financial hardship, a manual 28 day suppression will be placed on the account to ensure no late payment fees or charges are placed on the customer account. This removes the customer from the credit cycle, mitigating any new late payment fees. If there is a late payment fee currently on the account, it will be automatically removed by the suppression.</p> <p>Examination of the 2017-2018 Annual Compliance Report noted that there were 132 instances during the period where late payment fees charged on a customer's last bill were not waived. It is noted the hardship flag was introduced in January 2019, with no subsequent non-compliances noted.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 209:</p> <p>If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.</p> <p><i>Code of Conduct, clause 6.3(1)(a)</i></p>	<p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy, we noted Horizon Power have a process in place to provide assistance to customers who are assessed as experiencing payment difficulties. An overview of the assistance provided to financial hardship and payment difficulties customers when applicable is outlined below:</p> <ul style="list-style-type: none"> • Additional time to pay a bill through the application of an account suppression. This suppression will suspend all of the customer's credit activities for 28 business days. • Advise customers that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship. • Offer the option to enter into a payment arrangement plan. <p>Customers are offered these options over the phone by the CSRs or Credit team when they call about payment difficulties or financial hardship.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties and the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered an interest-free payment plan • All customers were advised that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship • Of the five samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 211:</p> <p>If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer additional time to pay a bill.</p> <p><i>Code of Conduct, clause 6.4(1)(a)</i></p>	<p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, additional time to pay a bill. This will be processed through Velocity by a CSR, by placing a 28 day suspension of activities on the customer account. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • Of the five samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan or a HUGS application.

Reporting Manual number and Licence obligation	Issue
	Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.
<p>Legislative Obligation 213:</p> <p>When offering or amending an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must comply with subclause 6.4(2).</p> <p><i>Code of Conduct, clause 6.4(2)</i></p>	<p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, various payment arrangements. These include customised payment plans (max 12 months) that accommodate particular customer circumstances, utilising the system tools, business rules and work instructions that have been provided, e.g. take into consideration a customer that is struggling to meet bill payments, such as, a single parent with dependent children.</p> <p>Payment arrangements will be processed through Velocity, with a CSR placing a 28 day suspension of activity on the account to assist the customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Once a payment arrangement has been processed on a customer account, a Payment Arrangement Letter is automatically issued via email, containing the details of the agreed upon arrangement. If the customer does not have an email address, it is issued via mail. If a payment arrangement has been altered, the system will issue another Payment Arrangement Letter containing the new details.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered a payment arrangement in line with the Code of Conduct. The minimum amount to be paid was discussed with the customer, with the CSR taking into account the customers' ability to pay within a certain timeframe. • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. • Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>
<p>Legislative Obligation 214:</p> <p>If a residential customer accepts an instalment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 6.4(3)(a) within 5 business days, and notify the residential customer of any amendments to the instalment plan at least 5 business days before they come into effect.</p> <p><i>Code of Conduct, clause 6.4(3)</i></p>	<p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Velocity system, we noted Horizon Power will provide customers with confirmation of their payment arrangement within five business days. We noted once a payment arrangement plan has been set up through Velocity and agreed with the customer, the system automatically triggers a Payment Arrangement Confirmation letter to be generated and sent to the customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change.

Reporting Manual number and Licence obligation	Issue
	<ul style="list-style-type: none"> Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>
<p>Legislative Obligation 229:</p> <p>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).</p> <p><i>Code of Conduct, clause 7.1(1)</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager and examination of Horizon Power's Velocity Credit Cycle, we noted Horizon Power have the following processes and timeframes in place to ensure they use their best endeavours to contact the customer to advise them of the proposed disconnection and to ensure the customer is disconnected within the obliged timeframes:</p> <ul style="list-style-type: none"> Horizon Power will send an SMS reminder 14 business days after the invoice is sent to the customer. Horizon Power's Policy is to not disconnect a customer unless the outstanding amount is greater than \$300. A reminder notice is sent to the customer 16 business days after the invoice is sent to the customer, where the amount due is greater than \$50. The reminder notice advises customer to contact Horizon Power should they be experiencing payment difficulties. A Disconnection Warning Notice is sent five business days after the Reminder Notice, being 21 business days after the invoice issue date. The customer will receive a phone call five days after the Disconnection Warning Notice has been delivered, to inform the customer of their obligation to pay for the overdue account. A Disconnection Warning Card service order is raised 30 business days after the invoice issue date, Disconnection service orders take approximately five business days to be processed. <p>We noted this process is an automated process with reminder notices and disconnection warnings issued according to the timeframes above which are pre-programmed into Velocity.</p> <p>All amendments to letters, bills, notices and publicly available documents are reviewed by Retail Services and Legal team prior to release. Additionally, it was noted by the Retail Services Manager that in 2020, a Customer Experience Communication team was formed to develop customer written information.</p> <p>Review of Horizon Power's Reminder Notice Example notes the clear inclusion of an enquiries phone number, and outlines the actions a customer may take should they be experiencing payment difficulties.</p> <p>Review of a Disconnection Warning notes that Horizon Power provides at least five business days' notice to the customer, however it omits the complaints handling process including the contact number and option to access the Electricity Ombudsman.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 234:</p> <p>Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in subclauses 7.6(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.</p> <p><i>Code of Conduct, clause 7.6</i></p>	<p>Details:</p> <p>Through enquiries with the Senior Customer Service Officer, we noted if a complaint is made to Horizon Power or the Ombudsman, the CSR will apply a temporary complaint suppression to the customer's Velocity account. Suppression of a customer's account will halt any overdue notifications and will stop an account from being disconnected. We noted this temporary suppression applied is for a period of 28 days and CSRs will add a manual calendar reminder prior to the 28 business days to check the status of the complaint and decide whether an</p>

Reporting Manual number and Licence obligation	Issue
	<p>extension of the suppression is needed. Once a complaint has been resolved, the CSR will close the complaint in Velocity releasing the account from suppression.</p> <p>Sample testing of five customer complaints verified that customer's accounts were correctly suppressed where a complaint was made directly related to the reason for a proposed disconnection to Horizon Power, Ombudsman or an external dispute resolution body.</p> <p>It was noted through enquiries with the Metering Services Manager that disconnection service orders for AMI meters are raised in Velocity and sent to the metering data system, 'MDR Control' for action. It was confirmed that business rules are embedded in the 'MDR Control' system to disallow service orders to be processed:</p> <ul style="list-style-type: none"> • After 3.00 pm Monday to Thursday; or • After 12.00 noon on a Friday; or • On a Saturday, Sunday, public holiday or on the business day before a public holiday <p>Service orders which are raised in Velocity during the above times are sent to 'MDR Control' and placed in a queue to be actioned on the next available day.</p> <p>For non-AMI meters, service orders are processed immediately for the Regional Office to action involving a manual disconnection of electricity at a customer's supply address. It was noted in the 2017/18 Horizon Power Annual Compliance Report that two instances were identified where a customer was manually disconnected after 3pm for non-payment and another customer manually disconnected the day before a public holiday. This breach was also raised in the ERA Type 1 Licence Contravention Notice. Both instances were in relation to non-AMI meters. To prevent further reoccurrence of this breach, Horizon Power have put in place process rules to ensure manual service orders explicitly include reference to de-energisation timeframes as well as further training rolled out to all teams involved in the de-energisation process.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>
<p>Legislative Obligation 240:</p> <p>A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).</p> <p><i>Code of Conduct, clause 7.7(6)</i></p>	<p>Details:</p> <p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence 3 months prior to due dates to ensure enough time is provided for customer to turnaround responses.</p> <p>Review of the Life Support Customers Mailout Log 2017-2018 noted that the annual renewal and 3 year re-certification forms were last sent out to 17 life support customers within the Port Hedland and Kununurra regions between July 2017 and April 2018. Based on the existing life support customer data listing provided by Horizon Power, there were 48 existing life support customers within both Port Hedland and Kununurra regions as at the end of the audit period. It is noted that:</p> <ul style="list-style-type: none"> • Horizon Power had not requested annual confirmation from the 17 life support customers, during the audit period, since the last annual renewal and 3 year re-certification forms were sent out in 2017/18. • Horizon Power had not requested annual confirmation and 3 year re-certification from the remaining life support customers in both Port Hedland and Kununurra regions during the audit period. <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>

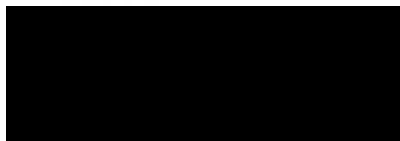
Reporting Manual number and Licence obligation	Issue
<p>Legislative Obligation 241:</p> <p>A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).</p> <p><i>Code of Conduct, clause 7.7(7)</i></p>	<p>Details:</p> <p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence three months prior to due dates to ensure enough time is provided for customer to turnaround responses. As stipulated within the procedural documents, life support flag will not be removed from the customer supply address if the customer fails to return an annual confirmation. However, life support flag can be removed from the supply address if customer fails to return the 3-year re-certification after the third reminder had been issued by telephone, fax, in person, mail or email. Each reminder have to be sent 20 business days apart. Removal of the life support flag for a customer is by way of putting an end date to the life support requirement on Velocity against the supply address, to advice the system that the condition is no longer active. Any changes to life support customer details will create a workflow on Velocity to be approved by the Retail Services Manager and changes will be included in the daily automated life support report sent out to the regions for review. Based on the daily automated SSN and mdata21 update true up report from MDR run at 3pm, metering will then update each site and remove the remote lock-out.</p> <p>Based on a walkthrough performed on a life support customer from the Kununurra region, we noted the customer had not returned an initial confirmation from an appropriately qualified medical practitioner regarding the life support requirement and had not been sent or returned an annual confirmation of the life support requirement during the audit period. However, we noted the customer details had not been removed from the life support register for failure to return a confirmation. Horizon Power has self-reported non-compliance against Obligation 241 in the 2017/18 and 2018/19 Annual Compliance Report and has taken a stand to not remove customer from the life support register without appropriate notification that the customer is no longer on life support requirement to mitigate the risk of harm to customers.</p> <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 319:</p> <p>A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p> <p><i>Electricity Industry Metering Code, clause 3.1</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager and review of relevant documentation, we noted the current Horizon Power meters are aligned with the 2017 Horizon Power Metrology Procedure.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and Metrology Procedure and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite

Reporting Manual number and Licence obligation	Issue
	<p>Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters.</p> <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 326:</p> <p>A network operator must ensure that there is a metering installation at every connection point on its network that is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p> <p><i>Electricity Industry Metering Code, clause 3.5(1) and (2)</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager we noted every new connection must follow a process in mData21 and Velocity whereby the customer's installation can only be connected by the issuance of a "connection service order" to one of Horizon Power's crews, resulting in a connection point being established with a metering installation.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Through enquiries with Metering Services Manager, it was confirmed that:</p> <ul style="list-style-type: none"> • The AMI-exchange project was completed in December 2016. • As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> o 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and o 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 327:</p> <p>For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p> <p><i>Electricity Industry Metering Code, clause 3.5(3)</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager and review of the Horizon Power Metrology Procedure, we noted Horizon Power provide, install, operate and maintain the metering installation in the manner prescribed under clause 3.5(3) of the Electricity Industry (Metering) Code 2012, namely:</p> <ul style="list-style-type: none"> • The Metrology Procedure was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1 of the procedure and came into effect on the 3rd of January 2018, with a draft submitted to the Authority for review on 10 April 2017. Amendments by the Authority were issued in June 2017. Prior to this, the Metrology Procedure used was from 2006. As the applicable 2006 Metrology Procedure does not specifically identify and capture Horizon Power's current AMI-enabled fleet of meters, no strong inferences have been drawn as to the adequacy of control provided by the metrology procedure. We noted Horizon Power had previously drafted an amended metrology procedure in 2014, however this was retracted. For the

Reporting Manual number and Licence obligation	Issue
	<p>interim period until the completion of installation for all advanced meters in 2017, Horizon Power adopted a draft of the 'Western Australian Electricity Market Metrology Procedures for Metering Installations' as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components.</p> <ul style="list-style-type: none"> • Under clause 1.2.1 of the Procedure, the purpose is to provide guidance on the correct provision, installation and maintenance of metering installations in line with the principles of the Code. • The procedure details the Metering installation types and accuracy requirements in line with the Electricity Industry (Metering) Code 2012. • In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed. • In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations. <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 333:</p> <p>Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code.</p> <p><i>Electricity Industry Metering Code, clause 3.9(3)</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager, we noted Horizon Power document the requirements of the metering type installations as specified in Table 3 in Appendix 1 of the Code within the Horizon Power Metrology Procedure. The requirements to be documented for each metering type installation are as follows:</p> <ul style="list-style-type: none"> • Annual throughput at connection point; • Maximum allowable overall error at full load – Active; • Maximum allowable overall error at full load – Reactive; • Minimum acceptable class or standard of components; • Clock error (seconds per month); • Minimum meter types; and • Measurement for reactive energy required. <p>Review of the Code and the Metrology Procedure noted the documents were aligned.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the</p>

Reporting Manual number and Licence obligation	Issue
	<p>allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>
<p>Legislative Obligation 341:</p> <p>Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.</p> <p><i>Electricity Industry Metering Code, clause 3.11A(2)</i></p>	<p>Details:</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that both single and three phase meters were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016, Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project, Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Through enquiries with the Metering Services Manager, it was confirmed that:</p> <ul style="list-style-type: none"> • The AMI-exchange project was completed in December 2016. • As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussions are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>As Horizon Power still had meters in operation of the same pattern types that had failed the 2011 Formway Group sample meter testing, which, was conducted more than three years ago, Horizon Power is deemed non-compliant with this obligation during the audit period.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement</p>

Reporting Manual number and Licence obligation	Issue
	needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.
<p>Legislative Obligation 370:</p> <p>The standing data for a metering point must comprise at least the items specified.</p> <p><i>Electricity Industry Metering Code, clause 4.3(1)</i></p>	<p>Details:</p> <p>Through enquiries with the Metering Services Manager and the Cyber & Information Security Officer, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. This includes standing data and energy data for each metering point on its network.</p> <p>It was identified during testing that mData21 does not contain all standing data items required under Table 2 'Description and designated source of standing data to be contained in the registry'. For example the length of network between the metering point and the substation it's not captured within mData21 or elsewhere within the organisation. The standing data items required under Table 2 identified as omitted from mData21 did not directly impact the customer.</p> <p>It was additionally noted that during fieldwork that, Horizon Power was in the process of drafting a set of Communication Rules. In assessing a recommended action plan, it was considered that in accordance with Clause 4.3(3) of the Code, Horizon Power may use its communication rules, once approved and published, to remove, modify or add any requirement in clause 4.3(1) for standing data.</p> <p>Previously, it was recommended that Horizon Power consider updating the draft communications rules document to remove, modify or add any requirement in clause 4.3(1) for standing data that is currently omitted from mData21. The communication rules are still in draft as negotiations are currently underway with another retailer to grant access to Horizon Power's network, at which point Communication Rules will be required. These are expected to be released in final by July 2020.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>



Travis McAuliffe

Partner, KPMG

29 July 2020

2. Executive Summary

2.1. Introduction

This document presents the findings emanating from Regional Power Corporation trading as Horizon Power ("Horizon Power") Electricity Integrated Regional Licence ("EIRL2") Performance Audit ("Audit"). Horizon Power's EIRL2 was amended to Version 22, 1 July 2018 since the previous Audit.

Horizon Power operates as a generator, transmitter, distributor and retailer. Horizon Power is the sole supplier and retailer of electricity to more than 47,700 connections, supplying more than 100,000 residents and more than 10,000 businesses in regional towns and remote communities across Western Australia.

Horizon Power operate 38 power systems, with more than 30 isolated power systems across the State and three interconnected systems in the Pilbara, East Kimberley and the Esperance region with regional offices based in Karratha, Broome, Kununurra, Carnarvon, Esperance and Port Hedland, with corporate support being delivered from Bentley.

The Audit covered the period 1 April 2017 to 31 March 2020. The Audit was undertaken in accordance with the Audit plan that was presented and approved by the Authority on 1 April 2020.

2.2. Objectives

The Audit objective was to evaluate the adequacy and effectiveness of the measures taken by Horizon Power to meet the performance obligations and quality standards referred to in the EIRL2 Version 21, 27 July 2015 and the EIRL2 Version 22, 1 July 2018. To this end, the Audit focused on Horizon Power's systems, processes, governance structures, reporting regimes and regulatory culture to enable compliance with the obligations, standards, outputs and outcomes stipulated in the EIRL2.

2.3. Scope

The scope of the Audit required an assessment of Horizon Power's systems, the effectiveness of its processes, and an appraisal of Horizon Power's use of regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the EIRL2. The Audit aimed to identify areas where remedial action is required and recommend corrective action as necessary. In addition, the Audit provided commentary on Horizon Power's culture of regulatory compliance.

The scope required an assessment of the adequacy and effectiveness of Horizon Power's performance against the licence requirements for the period 1 April 2017 to 31 March 2020 for EIRL2. These were assessed by considering:

- 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 (specifically, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- Integrity of reporting – the completeness and accuracy of the compliance reports and compliance registers provided to the ERA.
- Compliance with any individual licence conditions – the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.

- Consideration of the special areas of focus as advised by the Authority – (1) Annual Performance data and (2) Payment difficulties and financial hardship. Ensuring appropriate application of advised risk priority to those areas and undertaking the prescribed procedures.

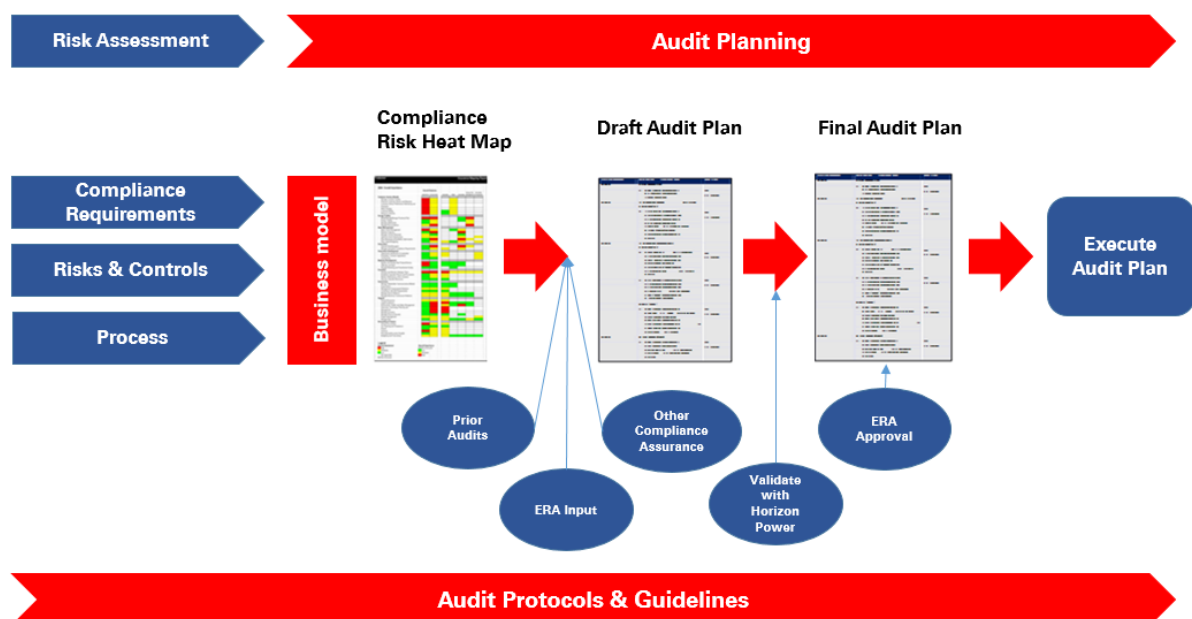
The key legislation, regulations and codes that govern Horizon Power's electricity retail operations are:

- Electricity Compliance Reporting Manual July 2016
- Electricity Compliance Reporting Manual July 2017
- Electricity Compliance Reporting Manual July 2018
- Electricity Industry (Customer Transfer) Code 2016
- Electricity Industry (Obligation to Connect) Regulations 2005
- Electricity Industry (Licence Conditions) Regulations 2005
- Electricity Industry (Customer Contracts) Regulations 2005
- Electricity Industry (Code of Conduct) Regulations 2005
- Electricity Industry (Ombudsman Scheme) Regulations 2005
- Electricity Industry Act 2004
- Electricity Integrated Regional Licence EIRL 2
- Code of Conduct for the Supply of Electricity to Small Use Customers 2016
- Code of Conduct for the Supply of Electricity to Small Use Customers 2018
- Electricity Industry (Metering) Code 2012
- Economic Regulation Authority (Licensing Funding) Regulations 2014
- Electricity Industry (Network Quality and Reliability Supply) Code 2005

2.4. Audit Planning Approach

In developing the Audit plan, KPMG adopted a risk based approach, consistent with the Authority's mandatory methodology for assessing risk, which is based on the ISO 31000:2018 Risk Management – Guidelines.

The diagram below provides a snapshot of the approach adopted in arriving at the Plan.



Step 1 – Establish the context

This step was undertaken in order to understand Horizon Power's business objectives, organisational culture and structure, the regulatory framework, industry codes, licence conditions, underlying systems and processes. Furthermore, this step allowed KPMG to understand Horizon Power's risk management culture and appetite. The key output from this step was the understanding and validation of Horizon Power's EIRL2 compliance obligation registers that were used as the basis in carrying out subsequent steps, as noted below.

Step 2 – Identify Risks

KPMG examined the licence conditions, and identified the risks that may affect compliance with these conditions. As part of this, KPMG considered where, when, why and how events could prevent, degrade or delay compliance with the licence obligations. Risk analysis was centred on the compliance risks as tabled below:

Type of Risk	Description
Supply quality and reliability	Delays in new connections, excessive supply interruptions, supply quality standards not met.
Consumer protection	Customer service levels not met, incorrect bills, disconnection and reconnection standards not met, customers unable to access financial hardship assistance.
Legislation/licence	Breach of industry Acts, regulations and codes, contravention of licence conditions.

Table 1: Compliance Risks

Step 3 – Risk Analysis

A two stage approach was adopted in analysing compliance risks:

- Firstly, KPMG identified the consequences and likelihood of the inherent risks to give an overall inherent risk rating.
- Secondly, KPMG identified and assessed the strength of the existing internal controls that mitigate the inherent risks.

2.5. Consequence

The consequences of the risk occurring was assessed using the 3-point rating scale described in the table below. The more significant the consequences, the higher the rating value allocated.

Rating		Non-compliance		
		Supply quality and reliability	Consumer protection	Breaches of legislation or other licence conditions
1	Minor	Breaches of supply quality or reliability standards – affecting small number of customers. Delays in providing a small proportion of new connections.	Customer complaints procedures not followed in a few instances. Small percentage of disconnections or reconnections not completed on time. Small percentage of bills not issued on time.	Legislative obligations or licence conditions not fully complied with, minor impact on customers or third parties Compliance framework generally fit for purpose and operating effectively.
2	Moderate	Supply quality breach events that significantly impact customers; large number of customers affected and/or extended duration and/or damage to customer equipment. Supply interruptions affecting significant proportion of customers on the network for up to one day. Significant number of customers experiencing excessive number of interruptions per annum. Significant percentage of new connections not provided on time/ some customers experiencing extended delays.	Significant percentage of complaints not being correctly handled. Customers not receiving correct advice regarding financial hardship. Significant percentage of bills not issued on time. Ongoing instances of disconnections and reconnections not completed on time, remedial actions not being taken or proving ineffective. Instances of wrongful disconnection.	More widespread breaches of legislative obligations or licence conditions over time. Compliance framework requires improvement to meet minimum standards.
3	Major	Supply interruptions affecting significant proportion of customers on the network for more than one day. Majority of new connections not completed on time/ large number of customers experiencing extended delays.	Significant failure of one or more customer protection processes leading to ongoing breaches of standards. Ongoing instances of wrongful disconnection.	Wilful breach of legislative obligation or licence condition. Widespread and/or ongoing breaches of legislative obligations or licence conditions. Compliance framework not fit for purpose, requires significant improvement.

Table 2: Consequence Rating

2.6. Likelihood

The likelihood was assessed using the 3-point rating scale described in the table below:

	Level	Criteria
A	Likely	Non-compliance is expected to occur at least once or twice a year
B	Probable	Non-compliance is expected to occur once every three years
C	Unlikely	Non-compliance is expected to occur once every 10 years or longer

Table 3: Likelihood Rating

2.7. Inherent Risk

The inherent risk was arrived through the combination of the consequence rating and the likelihood rating. The inherent risk rating that was used is depicted in the table below:

Likelihood	Consequence		
	1. Minor	2. Moderate	Major
A. Likely	Medium	High	High
B. Probable	Low	Medium	High
C. Unlikely	Low	Medium	High

Table 4: Inherent Risk Rating - Consequence

Described below are the inherent risk ratings:

Level	Description
High	Likely to cause major damage, disruption or breach of licence obligations
Medium	Unlikely to cause major damage but may threaten the efficiency and effectiveness of service
Low	Unlikely to occur and consequences are relatively minor

Table 5: Inherent Risk Rating

Step 4 - Identify and assess internal controls

Once the inherent risks were identified and classified, KPMG undertook a high level assessment of the internal controls that are in place to mitigate each inherent risk.

The table below describes the preliminary adequacy rating for existing controls:

Level	Description
Strong	Controls that mitigate the identified risks to a suitable level
Moderate	Controls that only cover material risks; improvement required
Weak	Controls are weak or non-existent and do little to mitigate the risks

Table 6: Adequacy Rating

Step 5 – Assign audit priority ratings

The next stage in the audit planning process was to determine audit priorities for each of the licence conditions based on the combined rating for inherent risk and control adequacy. The prescribed 5 level audit priority scale was used:

		Preliminary Adequacy of Existing Controls		
		Weak	Moderate	Strong
Inherent Risk	High	Audit priority 1	Audit priority 2	
	Medium	Audit priority 3	Audit priority 4	
	Low	Audit priority 5		

Table 7: Audit Priority

KPMG has adopted a singular approach by considering Horizon Power's control register which maps each licence condition to an associated control(s), undertook a risk assessment which included consideration and past compliance performance to determine an audit priority for each licence obligation.

Risk Rating	EIRL2 Risk Ranking by Obligation
High	28
Medium	312
Low	41
Not Applicable	117
TOTAL	498

Table 8: Risk Assessment Outcomes

The table below summarises the outcome of the audit priority assessment process.

Audit Priority Rating	EIRL2 Audit Priority by Obligation
Priority 1	0
Priority 2	48
Priority 3	13
Priority 4	284
Priority 5	36
Not Applicable	117
TOTAL	498

Table 9: Audit Priority by Obligation

2.8. Audit Plan Approval

Following the completion of the risk workshops and supporting activities, each obligation was reviewed and risk prioritised according to its inherent risk rating using the Authority's methodology. The relevant management team members confirmed the applicable risk and control ratings prior to completion of the Audit plan.

The final Audit Plan was approved by the Authority on 1 April 2020.

2.9. Execution of the Audit Plan

The execution stage comprised a singular audit priority assessment of each obligation. Testing took the form of interviews, walkthroughs, document reviews, process and system output reviews, observations and discussion, and substantive testing within requisite areas, with the testing being based on our sample test population. The nature of our testing and various sample sizes are detailed below:

Audit Priority	Nature of Testing	Sample Size (where relevant)
1	Inquiry, inspection and re-performance (where possible)	10
2	Inquiry, observation and inspection	5
3	Inquiry, observation and walkthrough	1
4	Inquiry and observation	1
5	Inquiry and observation	1

Table 10: Nature of Testing and Sample Size

A list of the licensee's representatives who participated in the Audit is provided in Appendix 1.

A list of key documents and other information sources examined during the course of the Audit is provided in Appendix 2.

We have reported an adequacy of controls rating and compliance rating for applicable obligations using the following structure in line with the Authority's guidelines:

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 effect on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period
N/A	Obligation was identified as not being applicable during the course of the audit	N/A	Obligation was identified as not being applicable during the course of the audit

Table 11: Compliance and Controls Rating Scales

2.10. Audit Team Members and Time Undertaken to Complete Audit

The following table outlines the auditor's personnel who undertook the audit and time taken to complete the audit procedures. Fieldwork commenced on 1 April 2020 and was completed on 25 May 2020.

Audit Members	Hours
Travis McAuliffe, Engagement Partner	24
Derek Meates, Quality Assurance Partner	2
Jacques Pienaar, Engagement Manager	135
Fish Sim, Senior Consultant	400
Sarah McCague, Consultant	120
Yoshi Takashima, Consultant	120
Jake Kouroulis, Consultant	120
Nino Volaric, Consultant	120
Total	1,041

Table 12: Audit Members and Hours

2.11. Culture of Compliance

Through conducting the 2020 EIRL2 Performance Audit, we note that Horizon Power management and staff have a positive, proactive culture and attitude towards compliance. Staff demonstrated initiative through extensive preparation of policy and procedural documentation and promptly responded to all data requests.

Management has designed and implemented processes, controls and systems to ensure compliance with licence obligations. In 2016, Horizon Power successfully completed the Meter Exchange Project, replacing approximately 48,563 old electricity meters with AMI that are capable of reading electricity consumption automatically. The advanced meters meet and exceed the Australian Standard and meet the WA Metering Code requirements leading to an overall improvement in compliance and

significantly reducing the risk of future non-compliance. A total of 159 meters were non-compliant at the end of the 2017 Audit period. This has now reduced to 19 with ongoing action being undertaken by Horizon Power to replace the remaining meters as soon as is possible.

Since the last audit in 2017, Horizon Power has made some improvements in the identification of customers in financial hardship and payment difficulties. This includes updating policy documents for hardship definition and the eligibility section. In January 2019, the financial hardship flag was introduced within Velocity. This has since improved the process of preparing the annual Retail Performance Datasheet.

Work instructions for life support processes were also updated to provide clarity on the requirement to obtain periodic confirmation from life support customers regarding the requirement of life support at their supply addresses. Whilst we note that management acknowledge there has not been performed during the audit period, training sessions were conducted with the Regional Managers in February 2020 in relation to this requirement. More stringent controls around the life support processes going forward also include physical visits by Regional Managers to the life support customer premises to confirm requirement of life support, particularly for non-contactable customers.

The strength of the compliance culture is also demonstrated through the comprehensive reporting of identified non-compliances. Where Horizon Power identified any non-compliance during the audit period, 1 April 2017 to 31 March 2020, Horizon Power was observed to proactively develop and implement remedial actions with the objective of mitigating the risk of a re-occurrence of the root cause. We note Management have explored opportunities to better utilise existing reporting tools to effectively monitor the Electricity Code requirements and promptly identify and report on historical non-compliance.

Where instances of non-compliance was identified during audit fieldwork, Horizon Power proactively undertook investigations with the objective of identifying the cause(s) to enable appropriate corrective measures to be developed. It was observed that Horizon Power management were able to make immediate improvements to the procedural documents and communicate those changes with relevant staff.

2.12. Areas of Special Focus

The Authority has nominated two areas of special focus for the 2020 EIRL2 Performance Audit, namely, Annual Performance Data and Payment Difficulties and Financial Hardship.

Annual Performance Data

Annual Performance Data consisted of one obligation, being 124. This obligation was rated as inadequate controls. The control improvement required is to ensure data used for annual performance reporting is retained and stored by Horizon Power in a format that can be readily extracted and audited (given data changes over time). Horizon Power has recently developed reports to meet new obligations for point in time data verification and reconciliations for the purpose of maintaining an audit trail. The control improvements have now been implemented. Due to the source data not being saved at the time of compiling the report, this could not be reperformed, therefore the obligation was not rated during the audit period. Further information can be found in section 5 of this report.

Payment Difficulties and Financial Hardship

Of the 18 obligations under special focus for Payment Difficulties and Financial Hardship, two were rated as non-compliant with a minor impact on customers or third parties and generally adequate controls with some improvement needed (209 and 211). An additional two were identified as non-compliant with moderate impact on customers or third parties and adequate controls with no improvement needed, however, they were resolved during the audit period (213 and 214).

2.13. Summary of action for previous audit non compliances and recommendations

The table below illustrates the profile of action taken by the licensee in response to the recommendations in the previous audit report dated 28 August 2017. Further details can be found in Section 3 previous non-compliances and audit recommendations.

	Resolved during current audit period	Unresolved at the end of the current audit period	Total
Total	13	5	18

Table 13: Actions in Response to Previous Report Recommendations

2.14. Performance summary from current audit

This performance audit involved testing 381 out of a total of 498 licence obligations. The 117 obligations not tested were determined as not applicable to Horizon Power during the planning stage of the audit. There were also 120 obligations with a Not Rated compliance rating due to no testable events in the audit period. This is consistent with the requirements stipulated within the Audit Guidelines.

The table below provides a summary of the audit outcome. There are 17 obligations rated as non-compliant for the audit period. There is further one obligation Not Rated with a recommendation for control improvement.

EIRL2		Adequacy of controls						Subtotal
		A – Adequate controls	B – Generally adequate controls	C – Inadequate controls	D – No controls evident	N/P – Not Performed	N/A – Not Applicable	
Compliance Rating	1 – Compliant	241	3	-	-	-	-	244
	2 – Non-compliant minor	7	7	-	-	-	-	14
	3 – Non-compliant moderate	2	1	-	-	-	-	3
	4 – Non-compliant major	-	-	-	-	-	-	-
	N/R - Not Rated	45	-	1	-	74	-	120
	N/A – Not Applicable	-	-	-	-	-	-	-
	Total	295	11	1	0	74	0	381

Table 14: Compliance Profile

The table below illustrates the obligations where non-compliances or control improvement opportunities have been identified. Further details can be found in Section 2.15 and 2.16.

Current Audit Non-Compliances and Recommendations	Resolved during current audit period	Unresolved at the end of the current audit period	Total
Obligations - Non-compliant	5	12	17
Obligations - Compliant with opportunity to improve controls	-	-	-
Obligations – Not-rated with opportunity to improve controls	-	1	1
Total	5	13	18

Table 15: Current Audit Non-Compliances and Recommendations

Further details of the overall compliance rating applied to each licence condition or obligation and adequacy of controls is detailed in Section 4 Performance Summary and Section 5 Observations – Performance audit details.

2.15. Current Audit Non-Compliances and Recommendations resolved during current Audit Period

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
145	<p>Non-Compliance</p> <p>Rating: A/2</p> <p>Legislative Obligation: 145 - 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</p> <p>Details:</p> <p>Through enquiries with the Retail Services Manager, we noted Horizon Power's Velocity system is encoded to ensure that customers are not billed more than once a month, and at least once every three months. The use of AMI meters ensures that reads are made multiple times throughout the day, and uploaded to Velocity from mData21.</p> <p>Examination of Compliance reports for 2017/2018 and 2018/2019 indicated that Horizon Power had reported two instances in 2017/18 and four instances in 2018/19 where customers had not been invoiced within the required 90 days period. The breaches during the 2018/2019 period predominantly related to human errors when setting up the customer accounts. The issue was resolved in the Velocity system through a program fix to repair records within mData21 and all customers were invoiced as soon as the program fix was implemented as well as offered additional time to pay. Since February 2019, Horizon Power have further strengthened their controls through monitoring daily automated unbilled reports and weekly reporting of potential breaches.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>	<p>February 2019</p> <p>System error resolved during audit period through implementation of program fix and controls introduced around the monitoring of daily automated unbilled reports and weekly reporting of potential breaches since February 2019.</p>	<p>The breach has been resolved during the audit period.</p> <p>No further action required.</p>
196	<p>Non-Compliance</p> <p>Rating: A/2</p> <p>Legislative Obligation: 196 – If a residential customer has been assessed as being in financial hardship, a retailer must retrospectively</p>	<p>January 2019</p> <p>Management introduced a Hardship flag coded into Velocity to identify customers on Hardship.</p>	<p>The breach has been resolved during the audit period.</p> <p>No further action required.</p>

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
	<p>waive any late payment fee charged to this customer's last bill prior to the assessment being made.</p> <p>Details:</p> <p>Through enquiries with the Retail Services Manager, we noted where a customer is assessed as being in financial hardship, a manual 28 day suppression will be placed on the account to ensure no late payment fees or charges are placed on the customer account. This removes the customer from the credit cycle, mitigating any new late payment fees. If there is a late payment fee currently on the account, it will be automatically removed by the suppression.</p> <p>Examination of the 2017-2018 Annual Compliance Report noted that there were 132 instances during the period where late payment fees charged on a customer's last bill were not waived. It is noted the hardship flag was introduced in January 2019, with no subsequent non-compliances noted.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
213	<p>Non-Compliance</p> <p>Rating: A/3</p> <p>Legislative Obligation: 213 - When offering or amending an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must comply with subclause 6.4(2).</p> <p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, various payment arrangements. These include customised payment plans (max 12 months) that accommodate particular customer circumstances, utilising the system tools, business rules and work instructions that have been provided, e.g. take into consideration a customer that is struggling to meet bill payments, such as, a single parent with dependent children.</p> <p>Payment arrangements will be processed through Velocity, with a CSR placing a 28 day suspension of activity on the account to assist the</p>	<p>August 2017</p> <p>The letter template contained the terms of the payment arrangement plan and the importance of contacting Horizon Power for further assistance if they cannot meet the financial obligations has been updated to include the consequence of not adhering to the terms of the arrangement.</p>	<p>The breach has been resolved during the audit period.</p> <p>No further action required.</p>

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
	<p>customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Once a payment arrangement has been processed on a customer account, a Payment Arrangement Letter is automatically issued via email, containing the details of the agreed upon arrangement. If the customer does not have an email address, it is issued via mail. If a payment arrangement has been altered, the system will issue another Payment Arrangement Letter containing the new details.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered a payment arrangement in line with the Code of Conduct. The minimum amount to be paid was discussed with the customer, with the CSR taking into account the customers' ability to pay within a certain timeframe. • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. • Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>		
214	<p>Non-Compliance</p> <p>Rating: A/3</p>	<p>August 2017</p> <p>The letter template contained the terms of the payment arrangement plan and the importance of contacting Horizon Power for further assistance if</p>	<p>The breach has been resolved during the audit period.</p> <p>No further action required.</p>

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
	<p>Legislative Obligation: 214 - If a residential customer accepts an instalment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 6.4(3)(a) within 5 business days, and notify the residential customer of any amendments to the instalment plan at least 5 business days before they come into effect.</p> <p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Velocity system, we noted Horizon Power will provide customers with confirmation of their payment arrangement within five business days. We noted once a payment arrangement plan has been set up through Velocity and agreed with the customer, the system automatically triggers a Payment Arrangement Confirmation letter to be generated and sent to the customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. • Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>	<p>they cannot meet the financial obligations has been updated to include the consequence of not adhering to the terms of the arrangement.</p>	

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
234	<p>Non-Compliance</p> <p>Rating: B/3</p> <p>Legislative Obligation: 234 - Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in subclauses 7.6(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.</p> <p>Details:</p> <p>Through enquiries with the Senior Customer Service Officer, we noted if a complaint is made to Horizon Power or the Ombudsman, the CSR will apply a temporary complaint suppression to the customer's Velocity account. Suppression of a customer's account will halt any overdue notifications and will stop an account from being disconnected. We noted this temporary suppression applied is for a period of 28 days and CSRs will add a manual calendar reminder prior to the 28 business days to check the status of the complaint and decide whether an extension of the suppression is needed. Once a complaint has been resolved, the CSR will close the complaint in Velocity releasing the account from suppression.</p> <p>Sample testing of five customer complaints verified that customer's accounts were correctly suppressed where a complaint was made directly related to the reason for a proposed disconnection to Horizon Power, Ombudsman or an external dispute resolution body.</p> <p>It was noted through enquiries with the Metering Services Manager that disconnection service orders for AMI meters are raised in Velocity and sent to the metering data system, 'MDR Control' for action. It was confirmed that business rules are embedded in the 'MDR Control' system to disallow service orders to be processed:</p> <ul style="list-style-type: none"> • After 3.00 pm Monday to Thursday; or • After 12.00 noon on a Friday; or • On a Saturday, Sunday, public holiday or on the business day before a public holiday <p>Service orders which are raised in Velocity during the above times are sent to 'MDR Control' and placed in a queue to be actioned on the next available day.</p> <p>For non-AMI meters, service orders are processed immediately for the Regional Office to action involving a manual disconnection of electricity at a customer's supply address. It was noted in the 2017/18 Horizon Power</p>	<p>October 2017</p> <p>Horizon Power have put in place process rules to ensure manual service orders explicitly include reference to de-energisation timeframes as well as further training rolled out to all teams involved in the de-energisation process.</p>	<p>The breach has been resolved during the audit period.</p> <p>No further action required.</p>

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (and management action taken)	Auditor comments
	<p>Annual Compliance Report that two instances were identified where a customer was manually disconnected after 3pm for non-payment and another customer manually disconnected the day before a public holiday. This breach was also raised in the ERA Type 1 Licence Contravention Notice. Both instances were in relation to non-AMI meters. To prevent further reoccurrence of this breach, Horizon Power have put in place process rules to ensure manual service orders explicitly include reference to de-energisation timeframes as well as further training rolled out to all teams involved in the de-energisation process.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>		

2.16. Current Audit Non-Compliances and Recommendations unresolved at end of current Audit Period

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
1/2020	<p>Non Compliance Rating: C/NR</p> <p>Legislative Obligation: 124 - A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p> <p>Details: Through enquiries with the Customer Services Process Manager, we noted Horizon Power are required to annually prepare and submit a Performance Report and Compliance Report to the ERA.</p> <p><i>Compliance Report</i> The Compliance Report is updated throughout the reporting year as breaches are identified. Horizon Power utilise their CURA system to automate reminders to the Customer Services Process Manager to submit the Annual Compliance Report to the ERA. The report contains the following information as specified by the ERA in the Electricity Compliance Reporting Manual:</p> <ul style="list-style-type: none"> Confirmation that Horizon Power has complied with all applicable Type 1 and 2 licence obligations during the period, other than those specifically referred to in Schedule A of the report; and Identified any Type 1 or Type 2 licence obligations that have been breached during the period and provided details of: <ul style="list-style-type: none"> The licence obligation that has been breached; The nature and extent of the breach; The impact of the breach including the number of customers and other licensees affected; The reasons for the breach; The actions that the licensee has taken to rectify the breach; The actions taken by the licensee to prevent recurrence of the breach; and 	Horizon Power to ensure supporting system reports generated at a point in time for the compilation of annual performance datasheets as well as reconciliation workings are properly maintained for the purpose of maintaining an audit trail.	<p>Details: Horizon Power is comfortable it has met its compliance obligations for reporting. The issues noted and control improvement required relates to ensuring data used for annual performance reporting is retained and stored in a format that can be readily extracted and audited (given data changes over time). Since the end of the audit period, Horizon Power has put significant effort into modifying systems and developing reports to meet new obligations for point in time data verification and reconciliation for the purpose of maintaining an audit trail. These control improvements have now been implemented. No further action.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: Completed in April 2020.</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<ul style="list-style-type: none"> o The date the licensee has, or expects to, comply again fully with the licence obligation that has been breached. <p>Sample testing was conducted over two Compliance Reports from the period and noted they contained the information as specified by the ERA, complying with the obligation requirements. Both were approved by the Chief Executive Officer and submitted prior to 31 August in their respective years.</p> <p><i>Performance Report</i></p> <p>Each year, the ERA will provide Horizon Power the information required to be submitted via the following templates:</p> <ul style="list-style-type: none"> • Electricity Compliance Manual Datasheet (the "Retail Datasheet"); • Electricity Licence Reporting Datasheets – Distribution ("Distribution Datasheet"); and • Electricity Licence Reporting Datasheets – Network Quality and Reliability Code ("Network Quality and Reliability Datasheet"). <p>The Customer Services Process Manager is responsible for compiling the data in these Datasheets and will submit these to the ERA prior to 30 September each year. The Distribution and Network Quality and Reliability Datasheets are compiled by other areas of the business, utilising data stored in Velocity and mData21 to provide figures against each indicator. We obtained the Distribution Datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>The Retail Datasheet is prepared by the Customer Services Process Manager with support from the Retail Systems Analyst. Data is extracted from Velocity and reviewed against each indicator. Once compiled, the Retail Datasheet is submitted to the ERA prior to 30 September. We obtained the Retail datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>A walkthrough was conducted with the Customer Services Process Manager and Retail Systems Analyst and noted the following process was taken to prepare the data for the indicators in relation to Customer Bill Debt and Financial Hardship:</p> <ul style="list-style-type: none"> • <i>Customer Bill Debt</i> <ul style="list-style-type: none"> o The Retail Systems Analyst will extract a listing of all customers with debt over 90 days from Velocity on 1 July each year. 		

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<ul style="list-style-type: none"> o The accounts will be reviewed, and those customers who appear to be classified as Financial Hardship will be excluded. o The data indicators will be prepared using this listing. o Note: Customer bill debt data can only be extracted at a real-time position. As debt constantly changes due to new bills being released or amounts being paid, we could not extract the same data to complete sample validation. The supporting customer debt data used was not saved by the Horizon Power team at the time of the Retail Datasheet preparation. <ul style="list-style-type: none"> • <i>Financial Hardship</i> <ul style="list-style-type: none"> o For the 2018/19 reporting year, the Retail Systems Analyst extracted two lists from Velocity; customers with bill debt over 90 days and customers with the Financial Hardship indicator flag present on the account from 30 June. The Financial Hardship Indicator flag was introduced in January 2019, therefore could only be used for half the reporting year. o The Customer bill debt data followed the same process as above, however, those customers that did not appear to be on Financial Hardship are excluded. o The Financial Hardship data is extracted into a table with the customer account number, flag start date, flag end data, creation date and time of the hardship identifier and the customer's Energy Bill Debt. o The Financial Hardship data table does not require cleansing, however the two data sets have to be matched to firstly calculate the total debt amount between duplicate entries and secondly, those duplicates were then removed from the data. o The data indicators are then prepared using this combined listing. o Note: Due to the process taken above, we could not complete the validation testing as it required analysis of accounts in debt at time of extraction, and as aforementioned, the data was not saved by the Horizon Power team at the time of the Retail Datasheet preparation. <p>The introduction of the Financial Hardship flag within Velocity from January 2019 will assist the Retail Systems Analyst in preparing the Retail Datasheet for upcoming financial years. However, this process could be further improved by storing the data used to compile the Customer Bill Debt within CS16 in order to support future performance audits.</p>		

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<p>Sample testing was attempted over the following performance indicators, however due to the source data not being saved at the time of compiling the report, this could not be reperformed:</p> <p><i>Energy Bill Debt</i></p> <ul style="list-style-type: none"> • Total number of residential customers (excluding hardship customers) repaying an energy bill debt as at 30 June. • Average amount of energy bill debt for residential customers (excluding hardship customers) as at 30 June. • Average amount of energy bill debt for business customers as at 30 June. • Total number of residential customers (excluding hardship customers) with energy bill debt that is over \$2,500 as at 30 June. • Total number of residential customers (excluding hardship customers) who were subject to an instalment plan as at 30 June. • Total number of residential customers (excluding hardship customers) who, during the reporting year, had their instalment plan cancelled by the retailer for non-payment. <p><i>Hardship customers</i></p> <ul style="list-style-type: none"> • Total number of residential customers on a retailer's hardship program as at 30 June. • Average energy bill debt of hardship customers as at 30 June. • Average energy bill debt (as at the time of entering the hardship program) for those hardship customers who entered the hardship program during the reporting year. • Total number of hardship customers who entered the hardship program during the reporting year, with an energy bill debt (as at the time of entering the hardship program) that was \$2,500 or more. • Total number of hardship customers who were subject to an instalment plan (excluding those who make their payment plan payments using Centrepay) as at 30 June. • Total number of residential customers who exited the hardship program during the reporting year. • Total number of residential customers who exited the hardship program during the reporting year, because they successfully completed the hardship program or exited the program by agreement with the retailer. 		

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<ul style="list-style-type: none"> Total number of residential customers who exited the hardship program during the reporting year, because they were excluded or removed from the hardship program for non-compliance. Total number of residential customers who successfully completed the hardship program, or exited by agreement with the retailer, during the reporting year or the previous reporting year, and who were subsequently disconnected during the reporting year for non-payment. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were inadequate controls with significant improvement needed, however due to the source data not being saved at the time of compiling the report, this could not be reperformed, therefore the obligation cannot be rated.</p>		
2/2020	<p>Non Compliance Rating: B/2</p> <p>Legislative Obligation: 135 - 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.</p> <p>Details: Through enquiries with the Retail Services Manager and examination of the NSC call script, we noted Horizon Power have controls in place to ensure information is provided to customers prior to agreeing in entering into a NSC. The NSC call scripts state that the customer may cancel the non-standard agreement at any time during the cooling-off period after which the customer must provide verifiable consent. However, examination of the NSC call scripts noted that the information specified under sub clause 2(b)-(j) and sub clause 4 is provided to customers after verifiable consent has been obtained, namely:</p> <ul style="list-style-type: none"> How the customer may obtain- <ul style="list-style-type: none"> A copy of the Code; and Details on all relevant tariffs, fees, charges, alternative tariffs and service levels that may apply to the customer The scope of the Code; 	Horizon Power to ensure information specified under sub clause 2(b)-(j) is provided to customers prior to obtaining their consent and to reflect this process as part of Horizon Power's NSC call scripts.	<p>Details: When discussing MyPower, which is subject to a non-standard form contract, a customer is asked 'if they would like to proceed' before advising all of the details required by the Code. Horizon Power has now amended the call script to ensure the required information is provided before verifiable consent is obtained. To potentially improve the Code this issue has been passed to the ECCC for consideration.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: Completed in May 2020.</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<ul style="list-style-type: none"> • That a retailer and electricity marketing agent must comply with the Code; • How the retailer may assist if the customer is experiencing payment difficulties or financial hardship; • With respect to a residential customer, the concessions that may apply to the residential customer; • The distributor's 24 hour telephone number for faults and emergencies • How a residential customer may access Horizon Power's – <ul style="list-style-type: none"> o Multi-lingual services; and o TTY services • How to make an enquiry of, or complaint to, the retailer; and • General information on the safe use of electricity. <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
3/2020	<p>Controls Improvement/Non Compliance Rating: B/2</p> <p>Legislative Obligation: 209 - If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.</p> <p>Details: Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy, we noted Horizon Power have a process in place to provide assistance to customers who are assessed as experiencing payment difficulties. An overview of the assistance provided to financial hardship and payment difficulties customers when applicable is outlined below:</p> <ul style="list-style-type: none"> • Additional time to pay a bill through the application of an account suppression. This suppression will suspend all of the customer's credit activities for 28 business days. 	Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties as part of their call scripts.	<p>Details: As instalment plans always incorporate additional time to pay, Horizon Power is comfortable that it meets the intent and wording of the Code.</p> <p>Being required to offering additional time to pay as a standalone in every circumstance seems to be one which would ignore the customers expressed position in many cases, particularly those customers referred to the credit team, where through the conversation it is obvious that a customer is in financial hardship and will not find additional time to</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<ul style="list-style-type: none"> Advise customers that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship Offer the option to enter into a payment arrangement plan. <p>Customers are offered these options over the phone by the CSRs or Credit team when they call about payment difficulties or financial hardship.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties and the following was noted:</p> <ul style="list-style-type: none"> All customers were offered an interest-free payment plan All customers were advised that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship Of the five samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>pay a bill helpful, and that the customer is need of an instalment plan.</p> <p>Horizon Power will remain in breach of this technical interpretation of the Code in order to facilitate a conversation suited to customer needs.</p> <p>The Customer Code is reviewed on a regular basis via a Consultative Committee (ECCC). This item has been raised and will be considered by the ECCC with a change to the Code a potential outcome. At this point management actions will be considered.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: June 2021</p>
4/2020	<p>Non Compliance</p> <p>Rating: B/2</p> <p>Legislative Obligation: 211 - If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer additional time to pay a bill.</p> <p>Details:</p> <p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, additional time to pay a bill. This will be processed through Velocity by a CSR, by placing a 28 day suspension of activities on the customer account. Training is provided to CSR's covering the process for assessing customers in regards to</p>	Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties or financial hardship as part of their call scripts.	<p>Details:</p> <p>As instalment plans always incorporate additional time to pay, Horizon Power is comfortable that it meets the intent and wording of the Code.</p> <p>Being required to offer additional time to pay as a standalone in every circumstance seems to be one which would ignore the customers expressed position in many cases, particularly those customers referred to the</p>

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	<p>payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Of the five samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan or a HUGs application. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>credit team, where through the conversation it is obvious that a customer is in financial hardship and will not find additional time to pay a bill helpful, and that the customer is need of an instalment plan.</p> <p>Horizon Power will remain in breach of this technical interpretation of the Code in order to facilitate a conversation suited to customer needs.</p> <p>The Customer Code is reviewed on a regular basis via a Consultative Committee (ECCC). This item has been raised and will be considered by the ECCC with a change to the Code a potential outcome. At this point management actions will be considered.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: June 2021</p>
5/2020	<p>Non Compliance</p> <p>Rating: B/2</p> <p>Legislative Obligation: 229 - 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</p>	Horizon Power to include reference to the Electricity Ombudsman and contact number for the Electricity Ombudsman in the disconnection warning template.	<p>Details:</p> <p>Horizon Power has now modified the Disconnection Warning Notice to include the required information.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date:</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<p>a disconnection warning, in the manner and timeframes specified in subclause 7.1(1)(c).</p> <p>Details:</p> <p>Through enquiries with the Metering Services Manager and examination of Horizon Power's Velocity Credit Cycle, we noted Horizon Power have the following processes and timeframes in place to ensure they use their best endeavours to contact the customer to advise them of the proposed disconnection and to ensure the customer is disconnected within the obliged timeframes:</p> <ul style="list-style-type: none"> • Horizon Power will send an SMS reminder 14 business days after the invoice is sent to the customer. • Horizon Power's Policy is to not disconnect a customer unless the outstanding amount is greater than \$300. • A reminder notice is sent to the customer 16 business days after the invoice is sent to the customer, where the amount due is greater than \$50. The reminder notice advises customer to contact Horizon Power should they be experiencing payment difficulties. • A Disconnection Warning Notice is sent five business days after the Reminder Notice, being 21 business days after the invoice issue date. • The customer will receive a phone call five days after the Disconnection Warning Notice has been delivered, to inform the customer of their obligation to pay for the overdue account. • A Disconnection Warning Card service order is raised 30 business days after the invoice issue date, • Disconnection service orders take approximately five business days to be processed. <p>We noted this process is an automated process with reminder notices and disconnection warnings issued according to the timeframes above which are pre-programmed into Velocity.</p> <p>All amendments to letters, bills, notices and publicly available documents are reviewed by Retail Services and Legal team prior to release. Additionally, it was noted by the Retail Services Manager that in 2020, a Customer Experience Communication team was formed to develop customer written information.</p>		Completed in June 2020.

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	<p>Review of Horizon Power's Reminder Notice Example notes the clear inclusion of an enquiries phone number, and outlines the actions a customer may take should they be experiencing payment difficulties.</p> <p>Review of a Disconnection Warning notes that Horizon Power provides at least five business days' notice to the customer, however it omits the complaints handling process including the contact number and option to access the Electricity Ombudsman.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
6/2020	<p>Controls Improvement/Non Compliance</p> <p>Rating: B/2</p> <p>Legislative Obligation: 240 - A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).</p> <p>Details:</p> <p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence 3 months prior to due dates to ensure enough time is provided for customer to turnaround responses.</p> <p>Review of the Life Support Customers Mailout Log 2017-2018 noted that the annual renewal and 3 year re-certification forms were last sent out to 17 life support customers within the Port Hedland and Kununurra regions between July 2017 and April 2018. Based on the existing life support customer data listing provided by Horizon Power, there were 48 existing life support customers within both Port Hedland and Kununurra regions as at the end of the audit period. It is noted that:</p>	<p>Horizon Power should examine the current life support customer listing to ensure that:</p> <ul style="list-style-type: none"> i. all initial certification forms have been sent out to life support customers and returned with sign off by an appropriately qualified medical practitioner confirming life support requirement; ii. annual confirmations with life support customers regarding the requirement of life support equipment (where applicable) are appropriately logged on Velocity; and iii. 3 year re-certification forms have been sent out to life support customers (where applicable) and returned with sign off by an appropriately qualified medical practitioner confirming life support requirement. <p>Additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation.</p> <p>In line with good practice, the returned forms should be retained electronically under the respective customer accounts for record keeping purposes.</p>	<p>Details:</p> <p>Given the very sensitive nature of removing customers from the life support register Horizon Power has always taken a low risk approach and only removed customers where evidence or agreement has been obtained.</p> <p>In Feb 2020 Horizon Power revised the process to trigger action on removing life support registration and equipment. This moves to active management of removal per requirements of the code.</p> <p>This process is managed locally with a largely manual process where customers are contacted and requested to provide evidence of the life support requirement. Given the nature of the process it is possible that breaches of this nature will continue, which do not disadvantage</p>

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	<ul style="list-style-type: none"> Horizon Power had not requested annual confirmation from the 17 life support customers, during the audit period, since the last annual renewal and 3 year re-certification forms were sent out in 2017/18. Horizon Power had not requested annual confirmation and 3 year re-certification from the remaining life support customers in both Port Hedland and Kununurra regions during the audit period. <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>customers or place them at risk.</p> <p>The process in place is as effective as is commercially reasonable and no further action is proposed.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: No further action is proposed, thus due date not applicable.</p>
7/2020	<p>Controls Improvement/Non Compliance</p> <p>Rating: B/2</p> <p>Legislative Obligation: 241 - A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).</p> <p>Details:</p> <p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence three months prior to due dates to ensure enough time is provided for customer to turnaround responses. As stipulated within the procedural documents, life support flag will not be removed from the customer supply address if the customer fails to return an annual confirmation. However, life support flag can be removed from the supply address if customer fails to return the 3-year re-certification after the third reminder had been issued by telephone, fax, in person, mail or email. Each reminder have to be sent 20 business days apart. Removal of the life support flag for a customer is by way of putting an end date to the life support requirement on Velocity</p>	<p>Horizon Power should update the current life support customer register to ensure that life support customers are removed upon satisfaction of subclause 7.7(7)(a)(i), (ii) or (iii) of the Code of Conduct.</p>	<p>Details:</p> <p>Given the very sensitive nature of removing customers from the life support register Horizon Power has always taken a low risk approach and only removed customers where evidence or agreement has been obtained.</p> <p>In Feb 2020 Horizon Power revised the process to trigger action on removing life support registration and equipment. This moves to active management of removal per requirements of the code.</p> <p>This process is managed locally with a largely manual process where customers are contacted and requested to provide evidence of the life support requirement. Given the</p>

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	<p>against the supply address, to advise the system that the condition is no longer active. Any changes to life support customer details will create a workflow on Velocity to be approved by the Retail Services Manager and changes will be included in the daily automated life support report sent out to the regions for review. Based on the daily automated SSN and mdata21 update true up report from MDR run at 3pm, metering will then update each site and remove the remote lock-out.</p> <p>Based on a walkthrough performed on a life support customer from the Kununurra region, we noted the customer had not returned an initial confirmation from an appropriately qualified medical practitioner regarding the life support requirement and had not been sent or returned an annual confirmation of the life support requirement during the audit period. However, we noted the customer details had not been removed from the life support register for failure to return a confirmation. Horizon Power has self-reported non-compliance against Obligation 241 in the 2017/18 and 2018/19 Annual Compliance Report and has taken a stand to not remove customer from the life support register without appropriate notification that the customer is no longer on life support requirement to mitigate the risk of harm to customers.</p> <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>nature of the process it is possible that breaches of this nature will continue, which do not disadvantage customers or place them at risk.</p> <p>The process in place is as effective as is commercially reasonable and no further action is proposed.</p> <p>Responsible Person: Manager Customer Service</p> <p>Due Date: No further action is proposed, thus due date not applicable.</p>
8/2020	<p>Non Compliance Rating: A/2</p> <p>Legislative Obligation: 319 - A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p> <p>Details:</p>	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	<p>Details:</p> <p>In response to the 2017 audit, Horizon Power advised it would continue to attempt to replace the then 46 meters that cause this breach. Through active management this number has been reduced to 19.</p> <p>In 2019 Horizon Power developed plans to forcibly replace these remaining</p>

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	<p>Through enquiries with the Metering Services Manager and review of relevant documentation, we noted the current Horizon Power meters are aligned with the 2017 Horizon Power Metrology Procedure.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AML-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and Metrology Procedure and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>meters per its rights under legislation.</p> <p>Prior to implementing the plan, the Minister was advised on the matter. Consequently Horizon Power changed its approach and will not force meter exchanges. As a result Horizon Power will remain in breach indefinitely.</p> <p>Current business process that has actioned meter exchanges when customers have moved out of a premise remain.</p> <p>Where the meters have not been exchanged due to the quality of the customer meter box (not meeting current standards), there is no obligation on the customer to rectify their installation. Whilst discussions continue with these customers there is no ability for Horizon Power to resolve this breach.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date: Ongoing. As customers move out of premises meters will be exchanged.</p>

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9/2020	<p>Non Compliance Rating: A/2</p> <p>Legislative Obligation: 326 - A network operator must ensure that there is a metering installation at every connection point on its network that is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p> <p>Details: Through enquiries with the Metering Services Manager we noted every new connection must follow a process in mData21 and Velocity whereby the customer's installation can only be connected by the issuance of a "connection service order" to one of Horizon Power's crews, resulting in a connection point being established with a metering installation.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Through enquiries with Metering Services Manager, it was confirmed that:</p> <ul style="list-style-type: none"> • The AMI-exchange project was completed in December 2016. • As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> ◦ 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and ◦ 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually 	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	<p>Details: In response to the 2017 audit, Horizon Power advised it would continue to attempt to replace the then 46 meters that cause this breach. Through active management this number has been reduced to 19.</p> <p>In 2019 Horizon Power developed plans to forcibly replace these remaining meters per its rights under legislation.</p> <p>Prior to implementing the plan, the Minister was advised on the matter. Consequently Horizon Power changed its approach and will not force meter exchanges. As a result Horizon Power will remain in breach indefinitely.</p> <p>Current business process that has actioned meter exchanges when customers have moved out of a premise remain.</p> <p>Where the meters have not been exchanged due to the quality of the customer meter box (not meeting current standards), there is no obligation on the customer to rectify their installation. Whilst discussions continue with these customers there is</p>

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	<p>tested to identify whether they are meeting the accuracy requirements required of utility meters.</p> <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>no ability for Horizon Power to resolve this breach.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date: Ongoing. As customers move out of premises meters will be exchanged.</p>
10/2020	<p>Non Compliance</p> <p>Rating: A/2</p> <p>Legislative Obligation: 327 - For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p> <p>Details: Through enquiries with the Metering Services Manager and review of the Horizon Power Metrology Procedure, we noted Horizon Power provide, install, operate and maintain the metering installation in the manner prescribed under clause 3.5(3) of the Electricity Industry (Metering) Code 2012, namely:</p> <ul style="list-style-type: none"> The Metrology Procedure was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1 of the procedure and came into effect on the 3rd of January 2018, with a draft submitted to the Authority for review on 10 April 2017. Amendments by the Authority were issued in June 2017. Prior to this, the Metrology Procedure used was from 2006. As the applicable 2006 Metrology Procedure does not specifically identify and capture Horizon Power's current AMI-enabled fleet of meters, no strong inferences have been drawn as to the adequacy of control provided by the metrology procedure. We noted Horizon Power had previously drafted an amended metrology procedure in 2014, however this was retracted. For the interim period until the completion of installation for all advanced meters in 2017, Horizon Power adopted a draft of the 	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	<p>Details: In response to the 2017 audit, Horizon Power advised it would continue to attempt to replace the then 46 meters that cause this breach. Through active management this number has been reduced to 19.</p> <p>In 2019 Horizon Power developed plans to forcibly replace these remaining meters per its rights under legislation.</p> <p>Prior to implementing the plan, the Minister was advised on the matter. Consequently Horizon Power changed its approach and will not force meter exchanges. As a result Horizon Power will remain in breach indefinitely.</p> <p>Current business process that has actioned meter exchanges when</p>

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	<p>'Western Australian Electricity Market Metrology Procedures for Metering Installations' as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components.</p> <ul style="list-style-type: none"> Under clause 1.2.1 of the Procedure, the purpose is to provide guidance on the correct provision, installation and maintenance of metering installations in line with the principles of the Code. The procedure details the Metering installation types and accuracy requirements in line with the Electricity Industry (Metering) Code 2012. In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed. In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations. <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. 		<p>customers have moved out of a premise remain.</p> <p>Where the meters have not been exchanged due to the quality of the customer meter box (not meeting current standards), there is no obligation on the customer to rectify their installation. Whilst discussions continue with these customers there is no ability for Horizon Power to resolve this breach.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date: Ongoing. As customers move out of premises meters will be exchanged.</p>

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	<p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		
11/2020	<p>Non Compliance Rating: A/2</p> <p>Legislative Obligation: 333 - Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code.</p> <p>Details: Through enquiries with the Metering Services Manager, we noted Horizon Power document the requirements of the metering type installations as specified in Table 3 in Appendix 1 of the Code within the Horizon Power Metrology Procedure. The requirements to be documented for each metering type installation are as follows:</p> <ul style="list-style-type: none"> • Annual throughput at connection point; • Maximum allowable overall error at full load – Active; • Maximum allowable overall error at full load – Reactive; • Minimum acceptable class or standard of components; • Clock error (seconds per month); • Minimum meter types; and • Measurement for reactive energy required. <p>Review of the Code and the Metrology Procedure noted the documents were aligned.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater</p>	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	<p>Details: In response to the 2017 audit, Horizon Power advised it would continue to attempt to replace the then 46 meters that cause this breach. Through active management this number has been reduced to 19.</p> <p>In 2019 Horizon Power developed plans to forcibly replace these remaining meters per its rights under legislation.</p> <p>Prior to implementing the plan, the Minister was advised on the matter. Consequently Horizon Power changed its approach and will not force meter exchanges. As a result Horizon Power will remain in breach indefinitely.</p> <p>Current business process that has actioned meter exchanges when customers have moved out of a premise remain.</p> <p>Where the meters have not been exchanged due to the</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<p>than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>		<p>quality of the customer meter box (not meeting current standards), there is no obligation on the customer to rectify their installation. Whilst discussions continue with these customers there is no ability for Horizon Power to resolve this breach.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date: Ongoing. As customers move out of premises meters will be exchanged.</p>
12/2020	<p>Non Compliance Rating: A/2</p> <p>Legislative Obligation: 341 - Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed</p>	Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.	<p>Details: In response to the 2017 audit, Horizon Power advised it would continue to attempt to replace the then 46 meters that cause</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	<p>and replaced with new meters within 3 years of the testing of the population.</p> <p>Details:</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that both single and three phase meters were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016, Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project, Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Through enquiries with the Metering Services Manager, it was confirmed that:</p> <ul style="list-style-type: none"> • The AMI-exchange project was completed in December 2016. • As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> • 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussions are currently underway with the customers to have this completed; and • 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>As Horizon Power still had meters in operation of the same pattern types that had failed the 2011 Formway Group sample meter testing, which, was conducted more than three years ago, Horizon Power is deemed non-compliant with this obligation during the audit period.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with</p>		<p>this breach. Through active management this number has been reduced to 19.</p> <p>In 2019 Horizon Power developed plans to forcibly replace these remaining meters per its rights under legislation.</p> <p>Prior to implementing the plan, the Minister was advised on the matter. Consequently Horizon Power changed its approach and will not force meter exchanges. As a result Horizon Power will remain in breach indefinitely.</p> <p>Current business process that has actioned meter exchanges when customers have moved out of a premise remain.</p> <p>Where the meters have not been exchanged due to the quality of the customer meter box (not meeting current standards), there is no obligation on the customer to rectify their installation. Whilst discussions continue with these customers there is no ability for Horizon Power to resolve this breach.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date:</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		Ongoing. As customers move out of premises meters will be exchanged.
13/2020	<p>Controls Improvement/Non Compliance Rating: B/2</p> <p>Legislative Obligation: 370 - The standing data for a metering point must comprise at least the items specified.</p> <p>Details: Through enquiries with the Metering Services Manager and the Cyber & Information Security Officer, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. This includes standing data and energy data for each metering point on its network.</p> <p>It was identified during testing that mData21 does not contain all standing data items required under Table 2 'Description and designated source of standing data to be contained in the registry'. For example the length of network between the metering point and the substation it's not captured within mData21 or elsewhere within the organisation. The standing data items required under Table 2 identified as omitted from mData21 did not directly impact the customer.</p> <p>It was additionally noted that during fieldwork that, Horizon Power was in the process of drafting a set of Communication Rules. In assessing a recommended action plan, it was considered that in accordance with Clause 4.3(3) of the Code, Horizon Power may use its communication rules, once approved and published, to remove, modify or add any requirement in clause 4.3(1) for standing data.</p> <p>Previously, it was recommended that Horizon Power consider updating the draft communications rules document to remove, modify or add any requirement in clause 4.3(1) for standing data that is currently omitted from mData21. The communication rules are still in draft as negotiations are currently underway with another retailer to grant access to Horizon Power's network, at which point Communication Rules will be required. These are expected to be released in final by July 2020.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed</p>	Horizon Power to finalise draft Communication Rules to remove, modify or add any requirement in clause 4.3(1) for standing data that is currently omitted from mData21.	<p>Details: Horizon Power drafted Communication Rules some years earlier to resolve this item. Finalisation of these rules is contingent on long running negotiations for access to Horizon Power's network and consequent publication of the rules for comment. Once these are concluded these rules will be finalised to resolve this item.</p> <p>Responsible Person: Metering Services Manager</p> <p>Due Date: The date for Open Access is expected to move out under Ministerial direction, consequently due date is set at July 2021.</p>

Manual Ref. / Year	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action
	and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.		

3. Previous Non Compliances and Audit Recommendations

3.1. Previous audit non-compliances resolved during current Audit Period

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
1/2017	<p>Non Compliance Rating: B / 2</p> <p>Legislative Obligation 158: 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.</p> <p>Details: Sample based testing of 15 regional customers identified one instance during the performance audit period, 1 April 2015 to 31 March 2017, where an actual meter reading for a non-advanced meter has not been performed at least once in a 12 month period. Horizon Power's advanced meters automatically send reads of the meter into the MDR every 15 minutes which is uploaded into mData21 overnight and therefore does not require physical inspection of meters to prepare invoices unless the connection is lost from the meter for more than 12 months.</p> <p>It is noted that in response to similar instances of non-compliance identified in the previous performance audit, Horizon Power proposed the following action plan in May 2015 for completion in September 2015 to ensure meter reading data is obtained as frequently as required to prepare its bills;</p> <ol style="list-style-type: none"> 1. Customer Service will continue with its existing continual process improvement methodology through weekly reporting and root cause analysis; 2. Process enhancements will be implemented, if identified; 3. Regional Managers are to reinforce with staff the importance of following the process. <p>It has been noted that following the completion of the Meter Exchange Project, the advanced meters will incorporate remote facilitation of meter reads and the likelihood of breaches will be further reduced.</p> <p>However, based on discussions with the Retail & Community Manager (Gascoyne) it was identified there was a lack of awareness of the current established procedural documentation, accessible in the Learning Guide, in relation to performing estimated reads and manual actual reads for advanced meters. Additionally, there is capability to generate a reports to monitor must read service order due dates against actual service order completion dates, however the Regional Offices are not currently using these monitoring mechanisms.</p>	Regional Managers are to reinforce with staff the importance of following the annual read process and to arrange training as required for using existing monitoring and reporting mechanisms to track outstanding must read service order due dates against actual service order completion dates.	May 2017	No further action required

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
2/2017	<p>Controls Improvement Rating: B / 1</p> <p>Legislative Obligation: 211 - If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer additional time to pay a bill. 212 - If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer an interest-free and fee-free instalment plan or other arrangement under which the residential customer is given additional time to pay a bill or to pay arrears (including any disconnection and reconnection charges), while being permitted to continue consumption.</p> <p>Details: Sample based testing was performed on five customers who were experiencing payment difficulties. Through observation of credit telephone calls and comments within Velocity, it was revealed that in all five instances a customer was offered the appropriate payment arrangement plan. However, testing revealed that one of the five credit call recordings could not be obtained. For this instance, testing was satisfied through the examination of comments within Velocity.</p>	Horizon Power investigate why the Serviceworks phone recording was unable to be obtained and subsequently consider if the appropriateness of implementing additional controls.	Not Applicable. Previous action plan by Management indicated they will not be implementing additional controls unless a commercial, customer or regularity risk arises. No issues noted in current audit period in relation to telephone recordings.	No further action required.

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
3/2017	<p>Controls Improvement Rating: B / NR</p> <p>Legislative Obligation: 238A - A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is registered as a life support equipment address. 239 - If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption.</p> <p>Details: Discussions with the Regional Retail and Community Services Manager (Carnarvon) noted that it is standard practice that depot staff door knock properties affected by a planned outage and drop a planned interruption card for them. All registered life support customers are located in the Carnarvon region. Business Services Officers in Carnarvon manually check the daily life support register with the planned outages to ensure to call customers affected by a planned outage at least three days prior. Examination of the generic planned interruption form showed that it is addressed to a specific street/road address with the day, date and time of the planned interruption and shows some considerations for the customer during a planned power interruption and relevant emergency contact numbers. It has been noted that there is no evidence retained demonstrating contact with a life support customer to update them on a planned outage and therefore compliance to this obligation can't be tested.</p>	<p>Regional Manager in Carnarvon to ensure staff capture detailed system notes where a life support customer and/or their caregiver has been contacted to inform of a planned outage. Management to update work instructions to capture this in the planned outages process.</p>	July 2017	No further action required

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
4/2017	<p>Controls Improvement Rating: B / 1</p> <p>Legislative Obligation 257: If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the supply address requires life support equipment, a retailer must not provide a pre-payment meter service in that address; or, if applicable, comply with the prescribed requirements in sub clauses 9.5(1) (a)-(c).</p> <p>Details: Discussions with the pre-payment meter officer determined that if a customer inquired about a pre-payment meter service but indicated a requirement for life support then Horizon Power would only offer a credit meter to that customer. It was noted that previously an Account Establishment Form which clearly stated "life support customers cannot be pre-payment customers" was widely used, however, since most pre-payment customers are now established by telephone, a review of the work instructions determined there is no prompt in the Velocity question-flow to remind the customer service operator to inquire about a customer's life support requirements. It is noted the pre-payment script includes this question when establishing pre-payment customers over the telephone.</p> <p>A comparison between the pre-payment customer meter listing and Horizon Power life support customer listing did not identify any customer who was on both listings.</p>	<p>Management to update the question flow within Velocity to include a question on whether the customer inquiring about a pre-payment meter service may also require life support.</p>	August 2017	No further action required

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
5/2017	<p>Controls Improvement Rating: B / 1</p> <p>Legislative Obligation 300: A retailer or a distributor must advise the customer in accordance with sub clause 12.1(3).</p> <p>Details: Through discussions with the Retail & Services Manager and examination of the Serviceworks Complaints Process Work Instructions and Customer Charter it was noted that when responding to a complaint, Horizon Power will advise the customer that the complaint can be assessed by a senior employee. If the customer is not satisfied with how the complaint has been resolved internally, Horizon Power will advise the customer of that the complaint can be referred to the Energy Ombudsman. The Energy Ombudsman's free call number 1800 754 004 is stated on the Horizon Power website and on the customer's bill.</p> <p>When customers submit a complaint form through the Horizon Power website, it is stated that a customer may have a complaint reviewed by a senior employee. This section of the website also states if the customer is not satisfied with the outcome of a lodged complaint, the customer is able to refer the complaint to the Energy Ombudsman.</p> <p>The Retail & Community Manager advised that a suite of training modules is offered to all Serviceworks staff, included in this suite of training is a module on the complaints process. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis.</p> <p>Sample based testing was performed on five customer complaints. Through observation of telephone call recordings and comments within Velocity, it was revealed that in all five instances the complaint was escalated to a senior employee or the customer was advised of the option to have the complaint escalated to a senior employee. However, this testing also revealed one of the five credit call recordings could not be located from Serviceworks. For this instance, testing criteria was satisfied through the examination of notes recorded in Velocity.</p>	Horizon Power investigate why the telephone recording was not able to be located to determine if additional controls are required to ensure retention of credit call recordings.	Not Applicable. Previous action plan by Management indicated they will not be implementing additional controls unless a commercial, customer or regularity risk arises. No issues noted in current audit period in relation to telephone recordings.	No further action required.

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
7/2017	<p>Non Compliance Rating: B / 2</p> <p>Legislative Obligation 386: A network operator must, for each meter on its network, at least once in every 12 month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.</p> <p>Details: Sample based testing of 15 regional customers identified one instance during the performance audit period, 1 April 2015 to 31 March 2017, where an actual meter reading for a non-advanced meter has not been performed at least once in a 12 month period. Horizon Power's advanced meters automatically send reads of the meter into the MDR every 15 minutes which is uploaded into mData21 overnight and therefore does not require physical inspection of meters to prepare invoices unless the connection is lost from the meter for more than 12 months.</p> <p>Examination of a report generated from mData21 identified that actual reads taken during the audit period found 831 instances of periods between actual reads exceeding 12 months. Of the 831 instances, 25 instances where the period between actual reads exceeded 12 months occurring entirely within the audit period. It was noted that the overall trend of when the instances occurred was in decline, with the majority occurring before August 2016, prior to the completion of the AMI project.</p> <p>It is noted that in response to similar breaches identified in the previous performance audit, Horizon Power proposed the following action plan in May 2015 for completion in September 2015 to ensure meter reading data is obtained as frequently as required to prepare its bills:</p> <ol style="list-style-type: none"> 1. Customer Service will continue with its existing continual process improvement methodology through weekly reporting and root cause analysis; 2. Process enhancements will be implemented, if identified; 3. Regional Managers are to reinforce with staff the importance of following the process. <p>However, based on discussions with the Retail & Community Manager (Gascoyne) it was determined that there was a lack of awareness of the current established procedural documentation in relation to performing estimated reads and manual actual reads for advanced meters in the regions. Additionally, there is capability to generate a reports to monitor must read service order due dates against actual service order completion dates, however the Regional Offices are not currently using these monitoring mechanisms.</p>	Regional Managers are to reinforce with staff the importance of following the process and to arrange training as required for using existing monitoring and reporting mechanisms to track outstanding must read service order due dates against actual service order completion dates.	August 2017	No further action required.

3.2. Unresolved at the end of current Audit Period

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
6/2017	<p>Non Compliance Rating: A / 2</p> <p>Legislative Obligation:</p> <p>319 - A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</p> <p>326 - A network operator must ensure that there is a metering installation at every connection point on its network that is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p> <p>327 - For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p> <p>330 - If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.</p> <p>333 - Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code.</p> <p>334 - A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.</p> <p>337 - A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p> <p>341 - Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of testing of the population.</p> <p>Details:</p>	<p>Horizon Power to continue progression with the exchange of the remaining non-compliant meters and communicate with the customers associated with these meters as far as possible.</p>	<p>Refer to the following Recommendations:</p> <ul style="list-style-type: none"> • 7/2020 – Obligation 319 • 8/2020 – Obligation 326 • 9/2020 – Obligation 327 • 10/2020 – Obligation 333 • 11/2020 – Obligation 341 <p>No further action required for obligations 330, 334, and 337. See section 5 for further information.</p>

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
	<p>The results of the sample meter testing performed by Formway Group in 2011, for both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed, excluding Landis & Gyr EM3330 meters and Eister meters installed post January 2010.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters.</p> <p>Through discussions with Manager Customer Service and Metering Services Manager it was confirmed that:</p> <ul style="list-style-type: none"> • All customers were informed that existing meters were non-compliant and may not be accurate. • The AMI-exchange project was completed in December 2016. • As the process of replacement of current meters with AMI was still in progress during the audit period, Horizon Power concluded that it was operating non-compliant meters during the audit period and was therefore non-compliant with this obligation. • As at the end of the audit period, Horizon Power had 159 meters on its network which had not yet been exchanged. For the metering installations associated with these 159 meters, it was noted: <ul style="list-style-type: none"> ◦ 46 are scheduled to be exchanged with an advanced meter; ◦ 90 had been de-energized, supply abolished, or were scheduled to be de-energized/supply abolished; and ◦ 23 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 23 meters are not verified, may no longer be pattern approved, and have not been subsequently individually tested to identify whether these are meeting the accuracy requirements required of utility meters. <p>The primary cause for all 23 non-compliant meters still in operation is, despite Horizon Power's best endeavours to reach agreements to allow for the exchange of the non-compliant meters, the customers associated with these meters have refused to allow Horizon Power to exchange the meters to the advanced meters.</p> <p>It was noted during fieldwork that Horizon Power submitted a revised Metrology Procedure and revised Mandatory Link Criteria to the Authority for review and approval on 12 April 2017, which is outside of this audit period.</p>		

Issue	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
8/2017	<p>Non Compliance Rating: A / 2</p> <p>Legislative Obligation: 366 - A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network. 370 - The standing data for a metering point must comprise at least the items specified.</p> <p>Details: Clause 4.3(1) of the Code requires that the standing data for a metering point must comprise at least the items specified in Table 2. It was identified during testing that mData21 does not contain all standing data items required under Table 2 'Description and designated source of standing data to be contained in the registry'. For example the length of network between the metering point and the substation it's not captured within mData21 or elsewhere within the organisation. The standing data items required under Table 2 identified as omitted from mData21 did not directly impact the customer. It was additionally noted during fieldwork that Horizon Power was in the process of drafting a set of Communication Rules. In assessing a recommended action plan, it was considered that in accordance with Clause 4.3(3) of the Code, Horizon Power may use its communication rules, once approved and published, to remove, modify or add any requirement in clause 4.3(1) for standing data.</p>	<p>Management to consider the identified standing data items required under Table 2 at have been omitted from mData21.</p>	<p>Obligation 366 was incorrectly grouped with Obligation 370 in the 2017 Performance Audit and an A/2 rating was not appropriate. This obligation has been rated as A/1 in the 2020 Performance Audit and no further action is required. Refer to section 5 of this report for further information. See Recommendation 12/2020 for Obligation 370.</p>

4. Performance summary

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
72	Electricity Industry (Obligation to Connect) Regulation, regulation 4	4	X						X					
73	Electricity Industry (Obligation to Connect) Regulation, regulation 5(5)	4	X						X					
74	Electricity Industry (Obligation to Connect) Regulation, regulation 5(6)	4	X						X					
75	Electricity Industry (Obligation to Connect) Regulation, regulation 6	4	X						X					
76	Electricity Industry (Obligation to Connect) Regulation, regulation 7(1)	4	X						X					
77	Electricity Industry (Obligation to Connect) Regulation, regulation 8	4	X						X					
78	Electricity Industry Act, section 51	4	X						X					
79	Electricity Industry (Customer Contracts) Regulations 2005, regulation 5	4	X						X					
80	Electricity Industry (Customer Contracts) Regulations	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	2005, regulation 6													
81	Electricity Industry (Customer Contracts) Regulations 2005, regulation 7	4	X						X					
82	Electricity Industry (Customer Contracts) Regulations 2005, regulation 8	4	X						X					
83	Electricity Industry (Customer Contracts) Regulations 2005, regulation 9	4	X						X					
84	Electricity Industry (Customer Contracts) Regulations 2005, regulation 10	4	X						X					
85	Electricity Industry (Customer Contracts) Regulations 2005, regulation 11	4	X						X					
86	Electricity Industry (Customer Contracts) Regulations 2005, regulation 12	4	X						X					
87	Electricity Industry (Customer Contracts) Regulations 2005, regulation 13	4	X						X					
88	Electricity Industry (Customer Contracts) Regulations 2005, regulation 14	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
89	Electricity Industry (Customer Contracts) Regulations 2005, regulation 15	4	X						X					
90	Electricity Industry (Customer Contracts) Regulations 2005, regulation 16 and 34	4	X						X					
91	Electricity Industry (Customer Contracts) Regulations 2005, regulation 17	4	X						X					
92	Electricity Industry (Customer Contracts) Regulations 2005, regulation 18	4	X						X					
93	Electricity Industry (Customer Contracts) Regulations 2005, regulation 19	4	X						X					
94	Electricity Industry (Customer Contracts) Regulations 2005, regulation 20	4	X						X					
95	Electricity Industry (Customer Contracts) Regulations 2005, regulation 21	4	X						X					
96	Electricity Industry (Customer Contracts) Regulations 2005, regulation 32	4	X						X					
97	Electricity Industry (Customer	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Contracts) Regulations 2005, regulation 33(2)													
98	Electricity Industry (Customer Contracts) Regulations 2005, regulation 33(3) and (4)	4	X										X	
99	Electricity Industry (Customer Contracts) Regulations 2005, regulation 36	4					X						X	
100	Electricity Industry (Customer Contracts) Regulations 2005, regulation 38	4					X						X	
101	Electricity Industry Act, section 13(1)	5	X						X					
102	Electricity Industry Act, section 14(1)(a)	5	X						X					
103	Electricity Industry Act, section 14(1)(b)	3	X										X	
104	Electricity Industry Act, section 14(1)(c)	5	X						X					
105	Electricity Industry Act, section 17(1) Economic Regulation Authority (Licensing Funding) Regulations 2014	4	X						X					
106	Electricity Industry Act, section 31(3)	5	X						X					
107	Electricity Industry Act, section 41(6)	4	X						X					
108	Electricity Industry Act, section 54(1)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
109	Electricity Industry Act, section 54(2)	4	X										X	
110	Electricity Industry Act, section 76	4					X						X	
111	Electricity Industry Act, section 101	4	X						X					
112	Electricity Industry Act, section 115(1)	4					X						X	
113	Electricity Industry Act, section 115(2)	4					X						X	
114	Integrated Regional Licence, condition 23.1	3	X						X					
115	Integrated Regional Licence, condition 23.2	4					X						X	
116	Integrated Regional Licence, condition 24.2	5	X										X	
117	Integrated Regional Licence, condition 24.3	5	X										X	
118	Integrated Regional Licence, condition 25.1	4	X										X	
119	Integrated Regional Licence, condition 12.1 or 24.1	4	X						X					
120	Integrated Regional Licence, condition 13.4 or 25.4	4	X										X	
121	Integrated Regional Licence, condition 14.2	4	X						X					
122	Integrated Regional Licence, condition 20.5	4	X						X					
123	Integrated Regional	4	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Licence, condition 15.1													
124	Integrated Regional Licence, condition 16.1	2			X								X	
125	Integrated Regional Licence, condition 17.1 and 17.2	4	X						X					
126	Integrated Regional Licence, condition 18.1	4	X						X					
127	Integrated Regional Licence, condition 29.1	2	X						X					
128	Integrated Regional Licence, condition 29.3	2	X										X	
129	Code of Conduct, clause 2.1 Integrated Regional Licence, condition 23.1	3					X						X	
130	Code of Conduct, clause 2.2(1) Integrated Regional Licence, condition 23.1	4	X						X					
131	Code of Conduct, clause 2.2(2) Integrated Regional Licence, condition 23.1	4	X						X					
132	Code of Conduct, clause 2.3(1) Integrated Regional Licence, condition 23.1	4		X					X					
133	Code of Conduct, clause 2.3(2) Integrated Regional Licence, condition 23.1	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
134	Code of Conduct, clause 2.3(4) Integrated Regional Licence, condition 23.1 (Regional Power Corporation)	4	X						X					
135	Code of Conduct, clause 2.3(5) Integrated Regional Licence, condition 23.1	4		X						X				
136	Code of Conduct, clause 2.4(1) Integrated Regional Licence, condition 23.1	4	X						X					
137	Code of Conduct, clause 2.4(2) Integrated Regional Licence, condition 23.1	4	X						X					
138	Code of Conduct, clause 2.5(1) Integrated Regional Licence, condition 23.1	4	X						X					
139	Code of Conduct, clause 2.5(2) Integrated Regional Licence, condition 23.1	4					X						X	
140	Code of Conduct, clause 2.6	4					X						X	
141	Code of Conduct, clause 2.9 Integrated Regional Licence, condition 23.1	4					X						X	
142	Code of Conduct, clause 2.10 Integrated Regional	4					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Licence, condition 23.1													
145	Code of Conduct, clause 4.1	2	X							X				
146	Code of Conduct, clause 4.2(1)	4					X						X	
147	Code of Conduct, clause 4.2(2)	4					X						X	
148	Code of Conduct, clause 4.2(3)	4					X						X	
149	Code of Conduct, clause 4.2(4)	4					X						X	
150	Code of Conduct, clause 4.2(5)	4					X						X	
151	Code of Conduct, clause 4.2(6)	4					X						X	
154	Code of Conduct, clause 4.4	4	X						X					
155	Code of Conduct, clause 4.5(1)	4	X						X					
156	Code of Conduct, clause 4.5(3)	2	X						X					
157	Code of Conduct, clause 4.6(1)	4	X						X					
158	Code of Conduct, clause 4.7	3	X						X					
159	Code of Conduct, clause 4.8(1)	4	X						X					
160	Code of Conduct, clause 4.8(2)	4	X						X					
161	Code of Conduct, clause 4.8(3)	4	X						X					
162	Code of Conduct, clause 4.9	4	X						X					
163	Code of Conduct, clause 4.10	5	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
165	Code of Conduct, clause 4.11(2)	4	X										X	
166	Code of Conduct, clause 4.12(1)	4	X						X					
167	Code of Conduct, clause 4.13	4	X						X					
168	Code of Conduct, clause 4.14(1)	5	X						X					
169	Code of Conduct, clause 4.14(2)	4	X						X					
170	Code of Conduct, clause 4.14(3)	4	X						X					
171	Code of Conduct, clause 4.15	4	X						X					
172	Code of Conduct, clause 4.16(1)(a)	4	X						X					
173	Code of Conduct, clause 4.16(1)(b)	4	X						X					
174	Code of Conduct, clause 4.16(2)	4	X						X					
175	Code of Conduct, clause 4.16(3)	4	X						X					
176	Code of Conduct, clause 4.17(2)	4	X										X	
176A	Code of Conduct, clause 4.17(3)	5	X										X	
177	Code of Conduct, clause 4.18(2)	4	X										X	
178	Code of Conduct, clause 4.18(3)	3	X										X	
179	Code of Conduct, clause 4.18(4)	5	X										X	
180	Code of Conduct, clause 4.18(6)	3	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
181	Code of Conduct, clause 4.18(7)	3	X										X	
182	Code of Conduct, clause 4.19(1)	4	X						X					
183	Code of Conduct, clause 4.19(2)	4	X						X					
184	Code of Conduct, clause 4.19(3)	3	X						X					
185	Code of Conduct, clause 4.19(4)	5	X						X					
186	Code of Conduct, clause 4.19(7)	5	X						X					
187	Code of Conduct, clause 5.1	4	X						X					
188	Code of Conduct, clause 5.2	4	X						X					
189	Code of Conduct, clause 5.3	4	X						X					
190	Code of Conduct, clause 5.4	4	X						X					
191	Code of Conduct, clause 5.5	4	X						X					
192	Code of Conduct, clause 5.6(1)	4	X						X					
193	Code of Conduct, clause 5.6(2)	4	X						X					
194	Code of Conduct, clause 5.6(3)	4	X						X					
195	Code of Conduct, clause 5.6(4)	4	X						X					
196	Code of Conduct, clause 5.6(5)	4	X							X				
197	Code of Conduct, clause 5.7(1)	2	X						X					
198	Code of Conduct, clause 5.7(2)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
199	Code of Conduct, clause 5.7(4)	4	X						X					
200	Code of Conduct, clause 5.8(1)	4	X						X					
201	Code of Conduct, clause 5.8(2)	4	X						X					
201A	Code of Conduct, clause 5.9	5	X						X					
202	Code of Conduct, clause 6.1(1)	2	X						X					
203	Code of Conduct, clause 6.1(3)	2	X						X					
204	Code of Conduct, clause 6.1(4)	2	X										X	
205	Code of Conduct, clause 6.2(1)	2	X										X	
206	Code of Conduct, clause 6.2(2)	2	X						X					
207	Code of Conduct, clause 6.2(3)	2	X						X					
208	Code of Conduct, clause 6.2(4)	2	X						X					
209	Code of Conduct, clause 6.3(1)(a)	2		X						X				
210	Code of Conduct, clause 6.3(1)(b)	2	X						X					
211	Code of Conduct, clause 6.4(1)(a)	2		X						X				
212	Code of Conduct, clause 6.4(1)(b)	2	X						X					
213	Code of Conduct, clause 6.4(2)	2	X								X			
214	Code of Conduct, clause 6.4(3)	2	X								X			
215	Code of Conduct, clause 6.6(1)	2	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
216	Code of Conduct, clause 6.6(2)	2	X						X					
217	Code of Conduct, clause 6.7	2	X						X					
218	Code of Conduct, clause 6.8	2	X						X					
219	Code of Conduct, clause 6.9(1)	2	X						X					
220	Code of Conduct, clause 6.10(1)	4	X						X					
221	Code of Conduct, clause 6.10(2)	2	X						X					
222	Code of Conduct, clause 6.10(3)	2	X						X					
223	Code of Conduct, clause 6.10(4)	4	X						X					
225	Code of Conduct, clause 6.10(6)	2	X										X	
226	Code of Conduct, clause 6.10(7)	4	X						X					
227	Code of Conduct, clause 6.10(8)	4	X										X	
228	Code of Conduct, clause 6.11	4	X						X					
229	Code of Conduct, clause 7.1(1)	4		X						X				
230	Code of Conduct, clause 7.2(1)	4	X						X					
232	Code of Conduct, clause 7.4(1)	4		X					X					
233	Code of Conduct, clause 7.5	4	X						X					
234	Code of Conduct, clause 7.6	2		X							X			
235	Code of Conduct, clause 7.7(1)	2	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
236	Code of Conduct, clause 7.7(2)	2	X						X					
237	Code of Conduct, clause 7.7(3)	2	X										X	
238	Code of Conduct, clause 7.7(4)	2	X						X					
238A	Code of Conduct, clause 7.7(4A)	3	X										X	
239	Code of Conduct, clause 7.7(5)	3	X										X	
240	Code of Conduct, clause 7.7(6)	4		X						X				
241	Code of Conduct, clause 7.7(7)	3		X						X				
242	Code of Conduct, clause 8.1(1)	2	X						X					
244	Code of Conduct, clause 8.2	4	X						X					
245	Code of Conduct, clause 9.1(2)	4	X						X					
246	Code of Conduct, clause 9.2(1)	4	X						X					
247	Code of Conduct, clause 9.2(2)	4	X						X					
249	Code of Conduct, clause 9.3(1)	4	X						X					
250	Code of Conduct, clause 9.3(2)	4	X						X					
251	Code of Conduct, clause 9.3(3)	4	X						X					
252	Code of Conduct, clause 9.3(4)	4	X										X	
253	Code of Conduct, clause 9.3(5)	4	X						X					
254	Code of Conduct, clause 9.4(1)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
255	Code of Conduct, clause 9.4(2)	4	X						X					
256	Code of Conduct, clause 9.4(4)	4	X						X					
257	Code of Conduct, clause 9.5(1)	2	X										X	
258	Code of Conduct, clause 9.5(2)	2	X										X	
259	Code of Conduct, clause 9.6	4	X						X					
260	Code of Conduct, clause 9.7(a), (b) and (d)	4	X						X					
261	Code of Conduct, clause 9.8	4	X						X					
262	Code of Conduct, clause 9.9(1)	4	X										X	
263	Code of Conduct, clause 9.9(2)	4	X										X	
264	Code of Conduct, clause 9.9(4)	4	X										X	
265	Code of Conduct, clause 9.10(1)	4	X						X					
266	Code of Conduct, clause 9.10(2)	5	X										X	
267	Code of Conduct, clause 9.10(3)	4	X										X	
268	Code of Conduct, clause 9.10(4)	5	X										X	
269	Code of Conduct, clause 9.10(6)	4					X						X	
270	Code of Conduct, clause 9.11(1)	4					X						X	
271	Code of Conduct, clauses 9.11(2) and (3)	5	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
272	Code of Conduct, clause 10.1(1)	4	X						X					
273	Code of Conduct, clause 10.1(2)	4	X						X					
274	Code of Conduct, clause 10.1(3)	4	X						X					
275	Code of Conduct, clause 10.2(1)	4	X						X					
276	Code of Conduct, clause 10.2(2)	4	X						X					
277	Code of Conduct, clause 10.2(3)	4	X						X					
278	Code of Conduct, clause 10.2(4)	4	X						X					
279	Code of Conduct, clause 10.3	4	X						X					
280	Code of Conduct, clause 10.3A	4	X						X					
281	Code of Conduct, clause 10.4	4	X						X					
282	Code of Conduct, clause 10.5	4	X						X					
283	Code of Conduct, clause 10.6	4	X						X					
284	Code of Conduct, clause 10.7(1)	4	X						X					
285	Code of Conduct, clause 10.7(2)	4	X						X					
286	Code of Conduct, clause 10.7(3)	4	X						X					
287	Code of Conduct, clause 10.7(4)	4	X						X					
288	Code of Conduct, clause 10.8(1)	4	X						X					
289	Code of Conduct, clause 10.8(2)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
290	Code of Conduct, clause 10.9	5	X						X					
291	Code of Conduct, clause 10.10(1)	4	X						X					
292	Code of Conduct, clause 10.10(2)	4	X						X					
294	Code of Conduct, clause 10.11(1)	4	X						X					
295	Code of Conduct, clause 10.11(2)	4	X						X					
296	Code of Conduct, clause 10.12(1)	4	X						X					
297	Code of Conduct, clause 10.12(2)	4	X						X					
298	Code of Conduct, clause 12.1(1)	4	X						X					
299	Code of Conduct, clause 12.1(2)	4	X						X					
300	Code of Conduct, clause 12.1(3)	4	X						X					
301	Code of Conduct, clause 12.1(4)	4	X						X					
302	Code of Conduct, clause 12.2	4	X						X					
303	Code of Conduct, clause 12.3	4	X						X					
304	Code of Conduct, clause 12.4	4	X										X	
305	Code of Conduct, clause 13.1	4	X						X					
306	Code of Conduct, clause 13.2	4	X						X					
307	Code of Conduct, clause 13.3	4	X						X					
308	Code of Conduct, clause 14.1(1)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
309	Code of Conduct, clause 14.1(2)	4					X						X	
310	Code of Conduct, clause 14.2(1)	4	X						X					
311	Code of Conduct, clause 14.2(2)	4					X						X	
312	Code of Conduct, clause 14.3(1)	4	X										X	
313	Code of Conduct, clause 14.4(1)	4	X										X	
314	Code of Conduct, clause 14.5	4	X						X					
315	Code of Conduct, clause 14.7(1)	4	X						X					
316	Code of Conduct, clause 14.7(2)	4	X						X					
319	Electricity Industry Metering Code, clause 3.1	2	X							X				
320	Electricity Industry Metering Code, clause 3.2(1)	4	X						X					
321	Electricity Industry Metering Code, clause 3.3(1)	4	X						X					
322	Electricity Industry Metering Code, clause 3.3(3)	4	X						X					
323	Electricity Industry Metering Code, clause 3.3A(1)	4	X						X					
324	Electricity Industry Metering Code, clause 3.3B	4					X						X	
325	Electricity Industry Metering Code, clause 3.3C	4	X										X	
326	Electricity Industry Metering Code,	3	X							X				

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	clause 3.5(1) and (2)													
327	Electricity Industry Metering Code, clause 3.5(3)	2	X							X				
328	Electricity Industry Metering Code, clause 3.5(4)	4	X						X					
329	Electricity Industry Metering Code, clause 3.5(6)	4					X						X	
330	Electricity Industry Metering Code, clause 3.5(9)	2	X						X					
331	Electricity Industry Metering Code, clause 3.7	4	X						X					
332	Electricity Industry Metering Code, clause 3.8	4	X						X					
333	Electricity Industry Metering Code, clause 3.9(3)	2	X							X				
334	Electricity Industry Metering Code, clause 3.9(7)	2	X						X					
335	Electricity Industry Metering Code, clause 3.9(9)	4					X						X	
336	Electricity Industry Metering Code, clause 3.10	4	X						X					
337	Electricity Industry Metering Code, clause 3.11(1)	3	X						X					
338	Electricity Industry Metering Code, clause 3.11(2)	4					X						X	
340	Electricity Industry Metering Code, clause 3.11A(1)	2	X						X					
341	Electricity Industry	2	X							X				

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 3.11A(2)													
342	Electricity Industry Metering Code, clause 3.12(1)	4	X						X					
343	Electricity Industry Metering Code, clause 3.12(2)	4	X						X					
344	Electricity Industry Metering Code, clause 3.12(3)	4	X						X					
345	Electricity Industry Metering Code, clause 3.12(4)	4	X						X					
346	Electricity Industry Metering Code, clause 3.13(1)	4					X						X	
347	Electricity Industry Metering Code, clause 3.13(3)(c)	4	X						X					
348	Electricity Industry Metering Code, clause 3.13(4)	4	X						X					
349	Electricity Industry Metering Code, clause 3.14(3)	2	X						X					
355	Electricity Industry Metering Code, clause 3.20(1)	4					X						X	
356	Electricity Industry Metering Code, clause 3.20(3)	4					X						X	
357	Electricity Industry Metering Code, clause 3.21(1)	2	X						X					
358	Electricity Industry Metering Code, clause 3.21(2)	4	X						X					
359	Electricity Industry Metering Code, clause 3.22	4	X						X					
360	Electricity Industry	4					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 3.23(a)													
361	Electricity Industry Metering Code, clause 3.23(b)	4					X						X	
362	Electricity Industry Metering Code, clause 3.24A(1)	4	X						X					
363	Electricity Industry Metering Code, clause 3.24B(1)	4	X						X					
364	Electricity Industry Metering Code, clause 3.27	4					X						X	
365	Electricity Industry Metering Code, clause 3.29	4					X						X	
366	Electricity Industry Metering Code, clause 4.1(1)	4	X						X					
367	Electricity Industry Metering Code, clause 4.1(2)	4	X						X					
368	Electricity Industry Metering Code, clause 4.1(3)	4	X						X					
370	Electricity Industry Metering Code, clause 4.3(1)	4		X						X				
371	Electricity Industry Metering Code, clause 4.4(1)	5					X						X	
374	Electricity Industry Metering Code, clause 4.6(1)	4					X						X	
375	Electricity Industry Metering Code, clause 4.6(2)	4					X						X	
376	Electricity Industry Metering Code, clause 4.7(1)	4					X						X	
377	Electricity Industry	4					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 4.8(3)													
378	Electricity Industry Metering Code, clause 4.8(3A)	4					X						X	
379	Electricity Industry Metering Code, clause 4.8(4)(a)	4	X						X					
380	Electricity Industry Metering Code, clause 4.8(4)(b)	4	X						X					
381	Electricity Industry Metering Code, clause 4.8(5)	4	X						X					
382	Electricity Industry Metering Code, clause 4.9	4	X						X					
383	Electricity Industry Metering Code, clause 5.1 (1)	5	X						X					
384	Electricity Industry Metering Code, clause 5.1(2)	5	X						X					
385	Electricity Industry Metering Code, clause 5.3	4	X						X					
386	Electricity Industry Metering Code, clause 5.4(1)	2	X						X					
387	Electricity Industry Metering Code, clause 5.4(1A)	2	X						X					
389	Electricity Industry Metering Code, clause 5.5(2)	4	X										X	
390	Electricity Industry Metering Code, clause 5.5(2A)	4	X						X					
391	Electricity Industry Metering Code, clause 5.6(1)	4					X						X	
392	Electricity Industry	4					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 5.7													
393	Electricity Industry Metering Code, clause 5.8	4					X						X	
394	Electricity Industry Metering Code, clause 5.9	4					X						X	
395	Electricity Industry Metering Code, clause 5.10	4					X						X	
397	Electricity Industry Metering Code, clause 5.12(1)	4					X						X	
398	Electricity Industry Metering Code, clause 5.13	4					X						X	
399	Electricity Industry Metering Code, clause 5.14(3)	4					X						X	
400	Electricity Industry Metering Code, clause 5.15	4					X						X	
403	Electricity Industry Metering Code, clause 5.17A(1)	4		X					X					
404	Electricity Industry Metering Code, clause 5.17A(3)	4	X						X					
409	Electricity Industry Metering Code, clause 5.19(5)	4					X						X	
411	Electricity Industry Metering Code, clause 5.20(1)	4					X						X	
412	Electricity Industry Metering Code, clause 5.20(2)	4					X						X	
413	Electricity Industry Metering Code, clause 5.20(4)	4					X						X	
414	Electricity Industry	4					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 5.21(2)													
415	Electricity Industry Metering Code, clause 5.21(4)	4					X						X	
418	Electricity Industry Metering Code, clause 5.21(8)	4					X						X	
419	Electricity Industry Metering Code, clause 5.21(9)	4					X						X	
420	Electricity Industry Metering Code, clause 5.21(11)	4					X						X	
421	Electricity Industry Metering Code, clause 5.21(12)	4					X						X	
422	Electricity Industry Metering Code, clause 5.22(1)	4	X						X					
423	Electricity Industry Metering Code, clause 5.22(2)	4	X										X	
424	Electricity Industry Metering Code, clause 5.22(3)	4	X						X					
425	Electricity Industry Metering Code, clause 5.22(4)	4					X						X	
426	Electricity Industry Metering Code, clause 5.22(5)	4	X						X					
427	Electricity Industry Metering Code, clause 5.22(6)	4	X						X					
428	Electricity Industry Metering Code, clause 5.23(1)	4	X						X					
429	Electricity Industry Metering Code, clause 5.23(3)	4	X						X					
430	Electricity Industry	4	X										X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 5.24(1)													
431	Electricity Industry Metering Code, clause 5.24(2)	4	X										X	
432	Electricity Industry Metering Code, clause 5.24(3)	4	X										X	
433	Electricity Industry Metering Code, clause 5.24(4)	4					X						X	
434	Electricity Industry Metering Code, clause 5.25	4	X						X					
447	Electricity Industry Metering Code, clause 6.1(1)	2	X						X					
448A	Electricity Industry Metering Code, clause 6.2	5	X						X					
448B	Electricity Industry Metering Code, clause 6.18	5	X						X					
448C	Electricity Industry Metering Code, clause 6.19A(1)	5					X						X	
448D	Electricity Industry Metering Code, clause 6.19B(1)	5					X						X	
449	Electricity Industry Metering Code, clause 6.20(4)	5	X						X					
450	Electricity Industry Metering Code, clause 6.20(5)	4	X						X					
452	Electricity Industry Metering Code, clause 7.2(2)	4					X						X	
457	Electricity Industry Metering Code, clause 8.1(1)	5					X						X	
458	Electricity Industry	5					X						X	

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Metering Code, clause 8.1(2)													
459	Electricity Industry Metering Code, clause 8.1(3)	5					X						X	
460	Electricity Industry Metering Code, clause 8.1(4)	4					X						X	
461	Electricity Industry Metering Code, clause 8.3(2)	5					X						X	
462	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 5(1)	5	X						X					
463	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 8	5	X						X					
464	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 9	5	X						X					
465	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 10(1)	5	X						X					
466	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 10(2)	5	X						X					
467	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 12(3)	4	X						X					
468	Electricity Industry (Network Quality and Reliability of Supply) Code	5	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	2005, clause 13(2)													
469	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 13(3)	4	X						X					
470	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 14(8)	4					X						X	
471	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 15(2)	4					X						X	
472	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 18	4	X						X					
473	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 19	2	X						X					
474	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(1)	4	X						X					
475	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(2)	4	X						X					
476	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(3)	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
477	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 23(1)	5	X						X					
478	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 23(2)	4	X						X					
479	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 24(3)	4	X						X					
480	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 24(4)	4	X						X					
481	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 25(2)	4	X						X					
482	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 25(3)	4	X						X					
483	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26	4	X						X					
483A	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	4	X						X					
483B	Electricity Industry (Network Quality and Reliability of	4	X						X					

Licence Obligation Reference No.	Licence Obligations	Audit Priority	Adequacy of Controls Rating (Refer to the 5-point rating scale on page 16 for details)						Compliance Rating (Refer to the 5-point rating scale on page 16 for details)					
			A	B	C	D	NP	NA	1	2	3	4	NR	NA
	Supply) Code, clause 26(5)													
484	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(1)	4	X						X					
485	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(3)	4	X						X					
486	Electricity Industry (Licence Conditions) Regulation, regulation 8	4					X						X	
487	Electricity Industry (Licence Conditions) Regulation, regulation 8	4					X						X	
488	Electricity Industry (Licence Conditions) Regulation, regulation 6	4	X						X					
489	Electricity Industry (Licence Conditions) Regulation, regulation 7	4	X						X					
490	Electricity Industry Act, section 61 and 65	4					X						X	
491	Electricity Industry Act, section 62, 64 and 65	4					X						X	
492	Electricity Industry Act, section 65	4					X						X	
496	Electricity Industry (Customer Contracts) Regulations 2005 regulation 40	4	X						X					

5. Observations – Performance

Audit Details

The following sets out the audit findings. The obligations are listed as these appear in the Electricity Compliance Reporting Manual October 2016, July 2017 and July 2018.

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
72	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 4	A distributor must attach, or connect, premises to a distribution system if a retailer or customer takes prescribed action and the circumstances exist in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations.	4	<p>Through enquiries with the Manager Asset Services and examination of Horizon Power's Supply Extension Policy, we noted Horizon Power have frameworks, processes and procedures in place to connect a premise to Horizon Power's distribution system both within and greater than 100m from the distribution point.</p> <p>As Horizon Power is both the retailer and the distributor, where a connection request has been received from a customer, they will connect a premise where the premise is located within 100m from the distribution point.</p> <p>Examination of the WADCM and Horizon Power's Supply Extension Policy noted the process to connect a customer greater than 100m from the distribution point is through the customer funded works program and capital works management process.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
73	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.	4	<p>Through enquiries with the Manager Asset Services and examination of Horizon Power's Supply Extension Policy, we noted Horizon Power have frameworks, processes and procedures in place to connect a premise to Horizon Power's distribution system both within and greater than 100m from the distribution point.</p> <p>As Horizon Power is both the retailer and the distributor, where a connection request has been received from a customer, they will connect a premise where the premise is located within 100m from the distribution point.</p> <p>Examination of the WADCM and Horizon Power's Supply Extension Policy noted the process to connect a customer greater than 100m from the distribution point is through the customer funded works program and capital works management process.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
74	Electricity Industry (Obligation to Connect)	Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice	4	Through enquiries with the Manager Asset Services, supplemented with an examination of the WADCM, we noted Horizon Power and Western Power recognised a consolidated manual was necessary to provide clear connection requirements in a format and language familiar	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Regulations, regulation 3		as would be applied by a prudent distributor.		<p>to the electrical consulting and contracting industry. Development of the consolidated manual was supported by Industry Associations, Energy Safety, Western Power and Synergy.</p> <p>The manual provides standards and guidance for connections in accordance with accepted good practices, including:</p> <ul style="list-style-type: none"> • Western Australian Electrical Requirements (WAER) • Electricity Corporations Act 2005 • Electricity Act 1945 • Electricity (Licensing) Regulations 1991 • Electricity (Supply Standards and System Safety) Regulations 2001 • Electricity Industry Act 2004 • Small Use Customer Code • Network Operator's Customer Service Charter • Electricity Industry (Obligation to Connect) Regulations 2005 • Electricity Industry Metering Code 2005 • Occupational Safety and Health Act 1984 • Occupational Safety and Health Regulations 1996 • National Standard for Construction Work • Mines Safety and Inspections Act 1994 • Mines Safety and Inspection Regulations 1995 • Energy Operators (Power's) Act 1979 • AS/NZS 3000: The Wiring Rules • AS/NZS 7000: Overhead Line Design • AS/NZS 61000: Electromagnetic Compatibility. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
75	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 6	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.	4	Through enquiries with the Customer Services Process Manager, we noted Horizon Power and Computershare have a suite of frameworks, processes and procedures in place to ensure a new premise is connected within 20 business days, and processes in place for connections exceeding 20 business days:	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Account Establishment: New accounts are established within three business days of a customer's request; Preliminary & Completion Notices: Completion notices are to be validated three business days of receipt from customer; New Connections Service Order: New Connection Service order is to be dispatched to the crew within one business day as a valid completion notice is accepted and entered into mData21; Late New Connections: if connections are expected to exceed 20 business days, customers must be sent a notification and explanation; Field Completion: Service order completed by the required by date; New connection service order completion in mData21 within five business days of field completion. <p>Examination of Horizon Power's New Connections Exceeding 20 Days flow map, notes that mData21 automatically generates a report each Monday, identifying new connections open greater than ten day. This report is reviewed by Regional Management and Works Delivery Coordinator is consulted to identify if the new connection is likely to exceed 20 days. Should a new connection be deemed likely to exceed 20 days, the customer is sent the 'Extended 20 Day New Connection Letter' that requires the customer's signature agreeing to an extension of the 20 days and a new revised connection day, complying with 6.(2)(b) of Electricity Industry (Obligation to Connect) Regulations.</p> <p>During the audit period, there were no reported breaches of Horizon Power failing to comply with the 20 business day connection time frame.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
76	Electricity Industry (Obligation to	Electricity Industry (Obligation to Connect)	A distributor must energise premises in certain prescribed circumstances.	4	Through enquiries with the Retail Services Manager and examination of key documentation, we noted Horizon Power has frameworks, processes and procedures in	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Connect) Regulations, regulation 3	Regulations, regulation 7(1)			place to energise a premises if the premises are attached to a distribution system but are not energised. As Horizon Power is both the retailer and distributor and where a request has been made by a customer, Horizon Power will connect a premise if the premises is attached to the distribution network. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
77	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	4	Through enquiries with the Retail Services Manager and examination of key documentation, we noted Horizon Power has frameworks, processes and procedures in place to connect a new premise within 20 business days. We noted Horizon Power endeavours to connect a premise within the 20 business day timeframe regardless of whether the premises are within a metropolitan or non-metropolitan area. Horizon Power is both the retailer and distributor and where a request has been made by a customer, Horizon Power will connect a premise if the premises is attached to the distribution network. Horizon Power has the following process to connect a new premise where it has been deemed safe to do so; <ul style="list-style-type: none"> Account Establishment; new accounts are established within three business days of a customer's request; Preliminary & Completion Notices; Completion notices are to be validated three business days of receipt from customer; New Connections Service Order; New Connection Service order is to be dispatched to the crew within one business day as a valid completion notice is accepted and entered into mData21; Late New Connections; if connections is expected to exceed 20 business days, customers must be sent a notification explaining why; Field Completion; Service order completed by the required by date; and 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> New connection service order completion in mData21 within five business days of field completion. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
78	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Act, section 51	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.	4	<p>Through enquiries with the Senior Customer Service Officer, we noted Horizon Power only uses the SFC published on the ERA's website, which had been approved by the ERA. All Horizon Power customers are advised by the Customer Service Team that a copy of the SFC is available on the Horizon Power's website at no charge.</p> <p>Review of Horizon Power's website noted that it provides a direct link to its SFC on the ERA's website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
79	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 5	A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' by completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release to ensure they are expressed in clear, simple, concise language and in a format that is easy to understand.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that it is presented in simple English and is easy to understand.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
80	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 6	A non-standard contract must specify when it comes into effect and the period for which it has effect.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that it includes a starting date for the supply of electricity (as described within clause 3), as well as an end date (as described within clause 18).</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
81	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 7	A non-standard contract must specify certain information about the retailer.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that Horizon Power provides customers details as specified under section 7 of the Electricity Industry (Customer Contracts) regulations.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
82	Retail Licence, condition 4.1.1	Electricity Industry (Customer	A non-standard contract must give an exact description of the goods and	4	Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Integrated Regional Licence, condition 4.1.1	Contracts) Regulations, regulation 8	services that the retailer will provide under the contract.		<p>'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that Horizon Power provides customers an exact description of the goods and services they will provide under the contract.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
83	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 9	A non-standard contract must require the customer to pay for electricity supplied under the contract.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that it requires the customer to pay for electricity supplied under the contract as specified in clause 4.1 'Charges' and clause 6 'Bills'.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
84	Retail Licence, condition 4.1.1 Integrated Regional	Electricity Industry (Customer Contracts)	A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1	Regulations, regulation 10			<p>sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 8.3 prohibits customers from tampering with, bypassing, circumventing or otherwise interfering with the network equipment, or allow anyone else to do so.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
85	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 11	A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 12.5 describes the circumstances under which Horizon Power has the right to disconnect supply and clause 12.7 describes the circumstances under which Horizon Power is required to reconnect supply.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
86	Retail Licence, condition 4.1.1 Integrated Regional	Electricity Industry (Customer Contracts) Regulations, regulation 12	A non-standard contract must require the retailer to deal with security deposits and the payment of interest in the manner that is specified.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form,</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				<p>are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 19 describes how Horizon Power will:</p> <ul style="list-style-type: none"> • Hold security deposits in a separate trust account; and • Identify security deposits in a separate accounting record, <p>as required under section 12 (1) of the Electricity Industry (Customer Contracts) regulations.</p> <p>We noted as Horizon Power falls under the definition of a 'relevant corporation' under Section 12(2) of the Electricity Industry (Customer Contracts) regulations, section 12(3) and section 12(4) do not apply to Horizon Power's customer contract.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
87	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 13	A non-standard contract must describe the retailer's obligations in relation to the provision of prices and tariff information.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of the MyPower Product Rules noted that clause 3.3 describes prices payable by a customer under the contract for both residential and non-residential plans. These include:</p> <ul style="list-style-type: none"> • A daily fixed charge; and • A variable energy usage charge 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Additionally, we noted clause 17.1 of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) describe how Horizon Power will provide customers with:</p> <ul style="list-style-type: none"> Information on the standard price and other fees within eight business days of the date of receipt and if requested, the information provided in writing. <p>From review of the MyPower Product Rules, we noted Horizon Power does not offer alternative tariffs under the NSC.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
88	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 14	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that clause 5 to 7 of the terms and conditions describe the procedures to be followed by Horizon Power in relation to the preparation, issue and review of customer bills.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
89	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 15	A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 18 includes all information related to the termination of a NSC as specified under section 15 of the Electricity Industry (Customer Contracts) regulations.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
90	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulations 16 and 34	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that clause 21.8 Amendments To Contract states, <i>"We can change the terms of the Contract in order for us to comply with any legal obligation imposed upon us with respect to our supply of electricity to consumers, including in the event that there is any change to the Electricity Industry (Customer Contract) Regulations 2005 (IVA). If we make any such change, we must notify you of that change as soon as is reasonably practicable following the change."</i> This, therefore, addresses requirements under sub clause 16(1) and clause 34 of the Electricity Industry (Customer Contracts) Regulations 2005.</p> <p>Additionally, clause 6 and clause 7 of the MyPower Product Rules provides customers information on Horizon Power's process when amending the NSC plan, therefore,</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>complying with sub clause 16(2) of the Electricity Industry (Customer Contracts) Regulations 2005.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
91	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 17	A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 21.3 provides information relating to the assignment of rights and obligations, and stipulates that Horizon Power can:</p> <ul style="list-style-type: none"> Assign or novate the NSC without notice to any person that Horizon Power believe has reasonable commercial and technical capability to perform Horizon Power's obligations under the agreement <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
92	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 18	A non-standard contract must describe the procedures that must be followed by the retailer in responding to a complaint made by a customer.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 16 provides information relating Horizon Power's complaints handling process, and states that:</p> <ul style="list-style-type: none"> Horizon Power will deal with customer complaints in accordance with Horizon Power's customer complaints policy as per Horizon Power's Customer Charter which is available to customers on request or from Horizon Power's website. Where the customer is not satisfied with how their complaint is being managed, the customer may have their complaints handled by a senior member of staff or referred to the Energy Ombudsman of Western Australia <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
93	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 19	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 15 specifies instances where Horizon Power will uphold the confidentiality of customer's information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
94	Retail Licence, condition 4.1.1 Integrated Regional	Electricity Industry (Customer Contracts) Regulations, regulation 20	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	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1		and the use of electronic communication by the retailer.		<p>and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted the following clauses:</p> <ul style="list-style-type: none"> • Clause 21.7 - The NSC is governed by the laws of the State of Western Australia; • Clause 21.9 – The effect of an invalid or unenforceable provision; • Clause 21.1 – The way in which notices may be given and when such notice is deemed to be given to customers; and • Clause 21.2 – The rules governing the use of electronic communication when dealing with customers. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
95	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 21	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,	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted there are no provisions in the NSC that excludes, restricts, or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless expressly authorised by the Code of Conduct.</p> <p>Additionally, clause 14(a)(ii) of Horizon Power's NSC Terms and conditions for MyPower states that:</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Nothing in the NSC is to be taken to exclude, restrict or modify any condition, warranty or guarantee that Horizon Power is prohibited by law from excluding, restricting or modifying. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
96	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 32	A non-standard contract must include details about the cooling off period specified in the regulation.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) and the MyPower Product Rules noted that the NSC defines a cooling-off period as a period of ten consecutive days following the date on which the customer and Horizon Power enter into the NSC.</p> <p>Additionally we noted the following clauses of the MyPower Product Rules include information regarding the cooling-off period for NSC as specified under section 32 of the Electricity Industry (Customer Contracts) regulation:</p> <ul style="list-style-type: none"> Clause 2.1 – Customers may terminate the NSC within the cooling-off period Clause 2.2 – Horizon Power will not supply customers electricity during the cooling-off period unless the customer has specifically requested supply Clause 2.3 – If customers have requested the supply of electricity during the cooling-off period, customers are required to pay Horizon Power for the electricity supplied. <p>Clause 2.1 and clause 2.3 require customers to pay Horizon Power for electricity supplied in the event that a customer exercises his or her right to terminate the contract during the cooling off period and therefore</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>complies with subsection 32(4)(b) of the Electricity Industry (Customer Contracts) regulation.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
97	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 33(2)	A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Review of Horizon Power's NSC Terms and conditions for MyPower for Small Use Customers (Electricity) noted that clause 18.2 requires customers to provide notice to Horizon Power not less than five days before the day on which the customers wants the NSC to end.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
98	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulations 33(3) and (4)	A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power commenced the use of NSC for the 'MyPower' product from 1 November 2018. Prior to this, Horizon Power did not offer any NSC. Customers who sign up to 'MyPower' via completing the applicable form, are provided with a copy of the NSC terms and conditions and product rules which together, comprise the legally binding contract. We noted the 'MyPower' NSC was initially drafted by the Retail Services and Legal team with the assistance of an external legal company. All amendments to the NSC are reviewed by the Retail Services and Legal team prior to release.</p> <p>Enquiries with the Retail Services Manager also confirmed that the MyPower NSCs are entered into under an opt-in opt-out agreement. Therefore, Horizon Power does not offer fixed term NSC, thus the requirement as specified under section 33(3) and 33(4) of the Electricity Industry</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					(Customer Contracts) regulation is not applicable and could not be rated for compliance. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.			
99	Retail Licence, condition 6.2.1 Distribution Licence, condition 6.2.1	Electricity Industry (Customer Contracts) Regulations, regulation 36	The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.	4	Based on enquiries held with the Retail Services Manager, it was concluded that no other electricity providers had access to Horizon Power's distribution system during the audit period, and as a result, they have not determined the default supplier for each connection point. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
100	Retail Licence, condition 6.8.1 Distribution Licence, condition 6.8.1	Electricity Industry (Customer Contracts) Regulations, regulation 38	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.	4	Through enquiries with the Senior Customer Service Officer, we noted supply of electricity is disconnected when the previous occupier closes their account. Customers will only be supplied electricity if they have entered into either a standard or non-standard form agreement with Horizon Power and therefore, Horizon Power will not place customers under a deemed contract. Based on enquiries held with the Senior Customer Service Officer, it was concluded that Horizon Power did not place customers under a deemed contract during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
101	Generation Licence, condition 5.3.1 Transmission Licence, condition 5.3.1 Distribution Licence, condition 5.3.1 Retail Licence, condition 5.3.1 Integrated Regional Licence, condition 5.3.1	Electricity Industry Act, section 13(1)	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.	5	Through enquiries with the Risk & Audit Specialist, we noted the Risk & Audit team maintains an action item within the risk management system, CURA, which prompts upcoming key activities and due dates. When the Authority publishes notices along with the performance report for the next audit due date, CURA is updated to ensure the tendering process for an independent auditor can commence with sufficient notice. The previous EIRL2 Performance Audit was conducted by KPMG in 2017 for the audit period 1 April 2015 to 31 March 2017. The Authority has approved the appointment of KPMG, on 12 February 2020, to conduct the performance audit for the audit period 1 April 2017 to 31 March 2020. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
102	Distribution Licence, condition 5.1.1 Generation Licence, condition 5.1.1 Integrated Regional Licence, condition 5.1.1 Transmission Licence, condition 5.1.1	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	5	Through enquiries with the Manager Asset Services, supplemented with an examination of the asset management documentation, we noted Horizon Power provided for an asset management system during the audit period. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
103	Distribution Licence, condition 5.1.2 and 5.1.3 Generation Licence, condition 5.1.2 and 5.1.3 Integrated Regional Licence, condition 5.1.2 and 5.1.3 Transmission Licence, condition 5.1.2 and 5.1.3	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	3	Through enquiries with the Manager Asset Services, supplemented with an examination of the asset management documentation, we noted Horizon Power provided for an asset management system during the audit period. Horizon Power notifies the ERA of their asset management system and any substantial changes to it, via automated reminders to the Manager Asset Services on the CURA system. The Manager Asset Services confirmed that during the audit period, Horizon Power did not make any substantial changes to the asset management system. The last substantial change to the asset management system was reported to the Authority in November 2013 which is outside the period of the current performance audit. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.	N/A	A	NR
104	Distribution Licence, condition 5.1.4 Generation Licence, condition 5.1.4 Integrated Regional	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	5	Through enquiries with the Manager Asset Services and review of relevant documentation, we noted Deloitte was appointed with the Authority's approval to undertake the asset management system review ("Review") for the 2017 period. The Review report was last submitted to the ERA and evidenced in a letter from the ERA dated 9 January 2018. Examination of the outcome letter issued	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 5.1.4 Transmission Licence, condition 5.1.4				by the Authority noted the next Review will cover the period 1 July 2017 to 30 June 2020. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
105	Distribution Licence, condition 4.2.1 Generation Licence, condition 4.2.1 Integrated Regional Licence, condition 4.2.1 Retail Licence, condition 4.2.1 Transmission Licence, condition 4.2.1	Electricity Industry Act, section 17(1) Economic Regulation Authority (Licensing Funding) Regulations 2014	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> .	4	The Economic Regulation Authority (Licensing Funding) Regulations clauses 6, 7 and 8 establishes the requirement for the payment of quarterly standing charges which are applied for a period of 3 months ending 30 September, 31 December, 31 March or 30 June. The Senior Legal Counsel noted the annual electricity licence fees are paid within one month of the 30 March anniversary date. All invoices issued by the Authority are received by the Tech Regulation & Compliance Officer and General Manager Corporate Service and Company Secretary, and processed through Horizon Power's accounts payable process. Examination of Horizon Power's financial records of licence fee payments and respective invoices noted that, during the audit period, the annual licence fees were paid within one month of the 30 March anniversary date and the quarterly standing charges were paid within 30 days on which notice was issued in accordance with the Economic Regulation Authority (Licensing Funding) Regulation clauses 6, 7 and 8. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period	N/A	A	1
106	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission	Electricity Industry Act, section 31(3)	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.	5	Through discussion with the Manager Asset Services, it was noted that Horizon Power has established a Crisis and Emergency Management Plan providing guidance on responding to, and recovering from an incident, emergency or crisis. Examination of the Crisis and Emergency Management Plan, specifically Appendix 10 outlines the specific actions to be undertaken during an electricity supply disruption. A comprehensive list of internal and external stakeholders, including key contact details of specialists are notified based on the severity of the event. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				improvement needed, and Horizon Power has complied with the obligation during the audit period.			
107	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	4	<p>Through enquiries with the Manager Sustainability, we noted Horizon Power had instances of interest in land or an easement over land during the audit period. Horizon Power has developed policies and procedures intended to provide guidance for the protection of Horizon Power assets, the level of protection and the appropriate steps required to ensure the method of protection is enforceable.</p> <p>The costs to obtain an easement may include the following:</p> <ul style="list-style-type: none"> • Survey including preparation of survey plans; • Preparation of Deed of Easement; • Expert advice; • Legal advice; • Lodgement costs; and • Compensation (Native Title and/or landowner) <p>Review of the easement or purchasing of land transactions noted that payments made in relation to the easements or purchasing of land are borne by the project team or through budget expenditure of the regions within Horizon Power.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
108	Integrated Regional Licence, condition 6.4.1 Retail Licence, condition 6.4.1	Electricity Industry Act, section 54(1)	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.	4	<p>Through enquiries with the Customer Services Process Manager, we noted all small-use customers are either on a SFC or NSC. Horizon Power outlines their obligation to not supply electricity to a customer otherwise than under a SFC or a NSC within their Connection Application Form.</p> <p>Review of Horizon Powers Connection Application Form, notes that Horizon Power will not supply electricity to a customer otherwise than under a SFC or a NSC as referenced in the <i>conditions of request to provide a formal quote</i>. The condition states that “...you will be required to enter into a Standard Form Contract or Standard Power Supply Agreement with Horizon Power...”</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
109	Integrated Regional Licence, condition 6.6.1 Retail Licence, condition 6.6.1	Electricity Industry Act, section 54(2)	A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.	4	<p>Through enquiries with the Customer Services Process Manager and Retails Services Manager, we noted if Horizon Power were directed to comply, with any direction by the ERA to amend the SFC, they would update the CURA system to reflect the direction including any period specified, with automated reminders assigned to the accountable personnel to address the SFC as required. If the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified.</p> <p>It was confirmed that Horizon Power did not receive any directions from the Authority to review or amend the SFC during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
110	Integrated Regional Licence, 6.7.1 Retail Licence, condition 6.7.1	Electricity Industry Act, section 76	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.	4	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power acts as a vertically integrated entity and there are no other retailers connected to Horizon Power's distribution network. Therefore, Horizon Power was not designated under section 71(1) of the Electricity Industry Act as a supplier of last resort during the audit period.</p> <p>Based on enquiries held with the Customer Services Process Manager, it was concluded that Horizon Power was not designated under section 71(1) of the Electricity Industry Act to perform the functions of a retailer of last resort during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
111	Distribution Licence, condition 6.1.1 Integrated Regional Licence, 6.1.1	Electricity Industry Act, section 101	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	4	Through enquiries with the Customer Service Process Manager, supplemented with a review of the Energy and Water Ombudsman's website and annual reports, we noted Horizon Power is a member of the Energy and Water Ombudsman Scheme.	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Retail Licence, condition 6.1.1		direction of the electricity ombudsman under the approved scheme.		Horizon Power has been granted an Electricity Integrated Regional Licence. The Licence precludes Horizon Power from supplying electricity to a small use customer unless it is a member of the approved electricity ombudsman scheme to which it is bound to comply with requirements in relation to customer complaints handling. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
112	Distribution Licence, condition 5.1 Integrated Regional Licence, 5.1 Transmission Licence, condition 5.1	Electricity Industry Act, section 115(1)	In relation to network infrastructure facilities covered by the Code, the network service provider or an associate of the network service provider, must not hinder or prevent: - access by any person to services under the Code; - the making of access agreements or other agreement in respect of those facilities; or - the access to which a person is entitled under an access agreement or a determination made by way of arbitration.	4	Through enquiries with the Retail Services Manager, we noted Horizon Power does not operate in a regulated/covered electricity network and there are currently no other users who have access to its networks. We also note that obligation 112 is no longer in used from July 2018. Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power does not have other users who have access to its networks thus had not hindered or prevented access to Horizon Power's network infrastructure facilities from 1 April 2017 to 30 June 2018, in which obligation 112 was in effect. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
113	Integrated Regional Licence, 5.1 Retail Licence, condition 5.1 Transmission Licence, condition 5.1	Electricity Industry Act, section 115(2)	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 that hinders or prohibits access.	4	Through enquiries with the Retail Services Manager, we noted Horizon Power does not operate in a regulated/covered electricity network and there are currently no other users who have access to its networks. We also note that obligation 113 is no longer in used from July 2018. Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power does not have other users who have access to its networks thus had not hindered or prevented access to Horizon Power's network infrastructure facilities from 1 April 2017 to 30 June 2018, in which obligation 113 was in effect. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
114	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.3.1	A licensee must ensure that an electricity marketing agent of the licensee complies with the applicable codes.	3	Through enquiries with the Retail Services Manager, we noted Horizon Power only engaged in one marketing activity during the audit period which was in relation to the MyPower Plan offered only to Broome and Port Hedland customers. The Retail Services Manager advised that	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Horizon Power have a dedicated MyPower team responsible for the MyPower product and that no other external parties are currently engaged by Horizon Power as “electricity marketing agents”.</p> <p>Horizon Power have processes and controls in place to ensure that the company, employees and electricity marketing agents comply with the Code of Conduct. These controls include a suite of training modules offered to employees and in-house electricity marketing agents as well as scripts for Computershare call centre staffs which provide guidance to abide with the code. Training is monitored and tracked within a spreadsheet which is updated and examined on a monthly basis.</p> <p>Through examination of the training register, it was confirmed that specific code of conduct training is provided to CSRs including MyPower agents.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
115	Electricity Industry Act, section 11	Integrated Regional Licence, condition 23.2	The licensee must report a breach of the applicable code conditions by an electricity marketing agent to the ERA within the prescribed timeframe.	4	Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power did not engage with an electricity marketing agent during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
116	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.4.2	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.	5	<p>Through enquiries with the Customer Services Process Manager and Retails Services Manager, we noted if the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified.</p> <p>It was confirmed that Horizon Power did not receive any directions from the Authority to review or amend the SFC during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
117	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.4.3	A licensee must comply with any direction given by the ERA in relation to the scope, process and	5	Through enquiries with the Customer Services Process Manager and Retails Services Manager, we noted if the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			methodology of the standard form contract review.		<p>review will be submitted to the ERA within the timeframe specified.</p> <p>It was confirmed that Horizon Power did not receive any directions from the Authority to review or amend the SFC during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
118	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.5.1	A licensee can only amend the standard form contract with the ERA's approval.	4	<p>Through enquiries with the Customer Services Process Manager and Retails Services Manager, we noted if the SFC were to be amended, a review would be undertaken by the Horizon Power Legal team and the results of the review will be submitted to the ERA within the timeframe specified.</p> <p>It was confirmed that Horizon Power had not amended the SFC during the audit period. It was also confirmed that Horizon Power did not receive any directions from the Authority to review or amend the SFC during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
119	Electricity Industry Act, section 11	Integrated Regional Licence, condition 4.3.1	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.	4	<p>The Financial Accounting Manager confirmed that Horizon Power complies with the Australian Accounting Standards. The published financial statements covering the audit period were sighted for the financial years ending 30 June 2017, 2018 and 2019 and we noted RSM Australia performed the independent audit of the financial statements of Horizon Power on behalf of the OAG, and the financial reports were prepared in accordance with the Australian Accounting Standards.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period</p>	N/A	A	1
120	Electricity Industry Act, section 11	Integrated Regional Licence, condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.	4	Through enquiries with the Customer Services Process Manager and Retails Services Manager, we noted if Horizon Power were directed to comply with any individual performance standards by the ERA, they would	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>update the CURA system to reflect the new performance standards, and allocate an accountable personnel to address the performance standard as required.</p> <p>It was confirmed with Horizon Power that they had not been prescribed individual performance standards by the Authority during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
121	Electricity Industry Act, section 11	Integrated Regional Licence, condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	<p>On 8 March 2017, the Authority approved Horizon Power's independent auditor, KPMG, to undertake the 2017 EIRL2 Performance Audit. The audit plan was prepared in accordance with the Authority's standard audit guidelines which was approved by the Authority on 7 April 2017.</p> <p>In the 2017 Performance Audit Report, KPMG confirmed the performance audit was conducted as a reasonable assurance engagement and was undertaken in accordance with the requirements under the April 2014 issue of the <i>Audit and Review Guidelines: Electricity and Gas Licences</i>.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
122	Electricity Industry Act, section 11	Integrated Regional Licence, condition 5.1.5	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	4	<p>On 28 April 2017, the Authority approved Horizon Power's independent auditor, Deloitte, to undertake the 2017 EIRL2 Asset Management System Review. The audit plan was prepared in accordance with the Authority's standard audit guidelines which was approved by the Authority on the 3 July 2017.</p> <p>In the 2017 Asset Management Review Report, Deloitte confirmed the review was conducted as a limited assurance engagement and was undertaken in accordance with the requirements under the April 2014 issue of the <i>Audit and Review Guidelines: Electricity and Gas Licences</i>.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
123	Electricity Industry Act, section 11	Integrated Regional Licence, condition 4.4.1	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	4	<p>Through enquiries with the Senior Legal Counsel and Paralegal we noted during the audit period, Horizon Power was not under external administration and there were no significant changes that affected Horizon Power's ability to meet its obligations. In the event that Horizon Power is under external administration, the General Manager Corporate Services and Company Secretary will notify the Authority.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
124	Electricity Industry Act, section 11	Integrated Regional Licence, condition 4.5.1	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	2	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power are required to annually prepare and submit a Performance Report and Compliance Report to the ERA.</p> <p><i>Compliance Report</i></p> <p>The Compliance Report is updated throughout the reporting year as breaches are identified. Horizon Power utilise their CURA system to automate reminders to the Customer Services Process Manager to submit the Annual Compliance Report to the ERA. The report contains the following information as specified by the ERA in the Electricity Compliance Reporting Manual:</p> <ul style="list-style-type: none"> • Confirmation that Horizon Power has complied with all applicable Type 1 and 2 licence obligations during the period, other than those specifically referred to in Schedule A of the report; and • Identified any Type 1 or Type 2 licence obligations that have been breached during the period and provided details of: <ul style="list-style-type: none"> ○ The licence obligation that has been breached; ○ The nature and extent of the breach; ○ The impact of the breach including the number of customers and other licensees affected; ○ The reasons for the breach; ○ The actions that the licensee has taken to rectify the breach; ○ The actions taken by the licensee to prevent recurrence of the breach; and 	<p><u>Recommendation 1/2020:</u></p> <p>Horizon Power to ensure supporting system reports generated at a point in time for the compilation of annual performance datasheets as well as reconciliation workings are properly maintained for the purpose of maintaining an audit trail.</p>	C	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The date the licensee has, or expects to, comply again fully with the licence obligation that has been breached. <p>Sample testing was conducted over two Compliance Reports from the period and noted they contained the information as specified by the ERA, complying with the obligation requirements. Both were approved by the Chief Executive Officer and submitted prior to 31 August in their respective years.</p> <p><i>Performance Report</i></p> <p>Each year, the ERA will provide Horizon Power the information required to be submitted via the following templates:</p> <ul style="list-style-type: none"> Electricity Compliance Manual Datasheet (the "Retail Datasheet"); Electricity Licence Reporting Datasheets – Distribution ("Distribution Datasheet"); and Electricity Licence Reporting Datasheets – Network Quality and Reliability Code ("Network Quality and Reliability Datasheet"). <p>The Customer Services Process Manager is responsible for compiling the data in these Datasheets and will submit these to the ERA prior to 30 September each year. The Distribution and Network Quality and Reliability Datasheets are compiled by other areas of the business, utilising data stored in Velocity and mData21 to provide figures against each indicator. We obtained the Distribution Datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>The Retail Datasheet is prepared by the Customer Services Process Manager with support from the Retail Systems Analyst. Data is extracted from Velocity and reviewed against each indicator. Once compiled, the Retail Datasheet is submitted to the ERA prior to 30 September. We obtained the Retail datasheets for the audit period and confirmed they were submitted using the template provided and prior to the due date required, complying with the obligation requirements.</p> <p>A walkthrough was conducted with the Customer Services Process Manager and Retail Systems Analyst</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>and noted the following process was taken to prepare the data for the indicators in relation to Customer Bill Debt and Financial Hardship:</p> <ul style="list-style-type: none"> • <i>Customer Bill Debt</i> <ul style="list-style-type: none"> o The Retail Systems Analyst will extract a listing of all customers with debt over 90 days from Velocity on 1 July each year. o The accounts will be reviewed, and those customers who appear to be classified as Financial Hardship will be excluded. o The data indicators will be prepared using this listing. o Note: Customer bill debt data can only be extracted at a real-time position. As debt constantly changes due to new bills being released or amounts being paid, we could not extract the same data to complete sample validation. The supporting customer debt data used was not saved by the Horizon Power team at the time of the Retail Datasheet preparation. • <i>Financial Hardship</i> <ul style="list-style-type: none"> o For the 2018/19 reporting year, the Retail Systems Analyst extracted two lists from Velocity; customers with bill debt over 90 days and customers with the Financial Hardship indicator flag present on the account from 30 June. The Financial Hardship Indicator flag was introduced in January 2019, therefore could only be used for half the reporting year. o The Customer bill debt data followed the same process as above, however, those customers that did not appear to be on Financial Hardship are excluded. o The Financial Hardship data is extracted into a table with the customer account number, flag start date, flag end date, creation date and time of the hardship identifier and the customer's Energy Bill Debt. o The Financial Hardship data table does not require cleansing, however the two data sets have to be matched to firstly calculate the total debt amount 			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>between duplicate entries and secondly, those duplicates were then removed from the data.</p> <ul style="list-style-type: none"> o The data indicators are then prepared using this combined listing. o Note: Due to the process taken above, we could not complete the validation testing as it required analysis of accounts in debt at time of extraction, and as aforementioned, the data was not saved by the Horizon Power team at the time of the Retail Datasheet preparation. <p>The introduction of the Financial Hardship flag within Velocity from January 2019 will assist the Retail Systems Analyst in preparing the Retail Datasheet for upcoming financial years. However, this process could be further improved by storing the data used to compile the Customer Bill Debt within CS16 in order to support future performance audits.</p> <p>Sample testing was attempted over the following performance indicators, however due to the source data not being saved at the time of compiling the report, this could not be reperformed:</p> <p><i>Energy Bill Debt</i></p> <ul style="list-style-type: none"> ● Total number of residential customers (excluding hardship customers) repaying an energy bill debt as at 30 June. ● Average amount of energy bill debt for residential customers (excluding hardship customers) as at 30 June. ● Average amount of energy bill debt for business customers as at 30 June. ● Total number of residential customers (excluding hardship customers) with energy bill debt that is over \$2,500 as at 30 June. ● Total number of residential customers (excluding hardship customers) who were subject to an instalment plan as at 30 June. ● Total number of residential customers (excluding hardship customers) who, during the reporting year, had their instalment plan cancelled by the retailer for non-payment. <p><i>Hardship customers</i></p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> • Total number of residential customers on a retailer's hardship program as at 30 June. • Average energy bill debt of hardship customers as at 30 June. • Average energy bill debt (as at the time of entering the hardship program) for those hardship customers who entered the hardship program during the reporting year. • Total number of hardship customers who entered the hardship program during the reporting year, with an energy bill debt (as at the time of entering the hardship program) that was \$2,500 or more. • Total number of hardship customers who were subject to an instalment plan (excluding those who make their payment plan payments using Centrepay) as at 30 June. • Total number of residential customers who exited the hardship program during the reporting year. • Total number of residential customers who exited the hardship program during the reporting year, because they successfully completed the hardship program or exited the program by agreement with the retailer. • Total number of residential customers who exited the hardship program during the reporting year, because they were excluded or removed from the hardship program for non-compliance. • Total number of residential customers who successfully completed the hardship program, or exited by agreement with the retailer, during the reporting year or the previous reporting year, and who were subsequently disconnected during the reporting year for non-payment. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were inadequate controls with significant improvement needed, however due to the source data not being saved at the time of compiling the report, this could not be reperformed, therefore the obligation cannot be rated.</p>			
125	Electricity Industry Act, section 11	Integrated Regional Licence,	A licensee must publish any information as directed by the ERA to	4	Through enquiries with the Customer Services Process Manager and review of documentation, we noted Horizon Power will publish information as directed by the ERA	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
		condition-3.8.1 and 3.8.2	publish, within the timeframes specified.		<p>within the timeframes specified. This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates.</p> <p>We noted Horizon Power published the 2016/17, 2017/18 and 2018/19 Annual Performance Report for its Integrated Regional Licence within the timeframes specified by the ERA. The Customer Services Process Manager confirmed that, during audit period, there were no other formal request from the Authority for information or directive to publish information such as reporting or notification.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
126	Electricity Industry Act, section 11	Integrated Regional Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.	4	<p>Through enquiries with the Customer Services Process Manager and review of email notifications to the ERA, it was determined that any notice will be issued to the relevant recipient via email, unless required to be issued by post.</p> <p>We have obtained and reviewed examples of notices between Horizon Power and the ERA, and noted that these notices were in writing.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
127	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.9.1	A distributor must create and maintain a Priority Restoration Register.	2	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Crisis and Emergency management documents, we noted Horizon Power has the following plans and records, which make up Horizon Power's Priority Restoration Register:</p> <ul style="list-style-type: none"> Crisis and Emergency Management Plan – providing guidance and protocol on responding to, and recovering from, an incident, emergency or crisis. The Plan applies to all Horizon Power network and office locations; Critical Customer Policy – provides a framework for the classification and application of critical customers and the management of restoration of electricity supply during an emergency or outage; Emergency Procedure – Severe Storms, Cyclones, Flood and Bushfire Response – outlines the process 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>and measures to be undertaken, including roles and responsibilities, during the event of severe storms, cyclones, flood and/or bushfire;</p> <ul style="list-style-type: none"> Regional Contingency Plan for each region – tailored emergency and crisis management plans specific to each regional depot. The plan also includes critical customers within the region and customers on life support for priority restoration; and Feeder Priority Lists – contained within the regional contingency plans, containing restoration priority of the feeders within the region. <p>Emergency response processes, including priority restoration procedures, are governed by the Critical Customer Policy and take into consideration the current life support customer listing when determining the priority of feeder restoration.</p> <p>Examination and walkthrough of the crisis and emergency response documentation in relation to an event occurring during the audit period, noted that actions undertaken were aligned to the regional contingency plan, including the business case for the priority in restoration of feeders.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
128	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.9.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	2	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Crisis and Emergency management documents, we noted should the Minister release any criteria for the Priority Restoration Register, the Manager Asset Services will update the documents in line with the criteria, and this will be reviewed by the Legal team. Once approved, they will be issued to the Minister for review and approval.</p> <p>Enquiries with the Manager Asset Services confirmed that the Minister has not detailed any specific criteria regarding the Priority Restoration Register during the audit period.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
129	Electricity Industry Act, section 82	Code of Conduct, clause 2.1 Integrated Regional Licence, condition 6.3.1	A retailer must ensure that its electricity marketing agents comply with Part 2 of the Code of Conduct.	3	Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power did not engage with an electricity marketing agent during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
130	Electricity Industry Act, section 82	Code of Conduct, clause 2.2(1) Integrated Regional Licence, condition 6.3.1	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).	4	<p>Through enquiries with the Retail Services Manager, we noted all SFCs entered into are not unsolicited consumer agreements and customers may enter into a SFC by either contacting a Horizon Power CSR, completing a web application form or Connection Application Form. We noted Horizon Power have the following controls in place to ensure SFCs are provided in the conditions specified under the Code of Conduct:</p> <ul style="list-style-type: none"> <i>Date entered into</i> The date in which a customer signs up to a SFC is automatically logged within Velocity <i>Standard Form Contract is available at no charge to the customer</i> All customers are advised that a copy of the SFC is publically available on Horizon Power's website at no cost as indicated by mandatory call scripts used by CSRs. If a customer requests a hard copy, Horizon Power will mail this to the address provided at no charge. All customers who submit a Web application form or Connection Application Form will receive a copy of the SFC attached to an acknowledgement email once the contract has been entered into. <p>Additionally, once a CSR has logged a new connection within Velocity upon entering a customer into a SFC, the system will automatically trigger a Welcome Letter to be sent to the customer. The Welcome Letter provides customers information on how to obtain a copy of the SFC.</p> <p>Under 2.2(3) of the Code of Conduct, the retailer or electricity marketing agent is taken to have given the customer the required information if they have informed the customer on how the customer may obtain the information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
131	Electricity Industry Act, section 82	Code of Conduct, clause 2.2(2) Integrated Regional Licence, condition 6.3.1	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.	4	<p>Through enquiries with the Retail Services Manager, we noted once a CSR has logged a new connection within Velocity upon entering a customer into a SFC, the system will automatically trigger a Welcome Letter to be sent to the customer and will therefore be provided prior to the customer's first bill. The Welcome Letter highlights the following three key documents and state that all documents can be obtained on the Horizon Power website along with information about electricity pricing, fees and charges:</p> <ul style="list-style-type: none"> • Customer Charter; • Code of Conduct for the Supply of Electricity to Small use Customers; and • SFC. <p>A copy of the Customer Charter was obtained and examined, and we noted the following information was included:</p> <ul style="list-style-type: none"> • The scope of the Code; • Horizon Power's obligation to comply with the Code; • How Horizon Power will assist a customer if the customer is experiencing financial hardship or payment difficulties; • Information on billing concessions that may be available to residential customers; • Horizon Power's 24-hour faults telephone number; • Interpreter and TTY services that are available to residential customers; • Details on how a customer can make a complaint; and • General information of electrical safety. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
132	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(1) Integrated Regional Licence, condition 6.3.1	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,	4	<p>Through enquiries with the Retail Services Manager, we noted all NSC entered into are not unsolicited consumer agreements and customers may enter into NSC by either contacting a Horizon Power MyPower representative, or completing a web application form.</p>	N/A	B	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			and the contract is provided as specified, in clause 2.3(1).		<p>We noted Horizon Power have the following controls in place to ensure NSC are provided in the conditions specified under the Code of Conduct:</p> <ul style="list-style-type: none"> • <i>Obtain verifiable consent</i> We noted all verifiable consents over the phone are recorded and stored in Velocity. For web application forms, verifiable consent is obtained through customer's acceptance of the NSC terms and conditions which is recorded and stored in Velocity. • <i>NSC is available at no charge to the customer</i> It was advised that the NSC is available at no charge on Horizon Power's website at the time of sign-up. All customers who enter into a non-standard form agreement will also receive a copy of the NSC attached to an acknowledgement email once the contract has been entered into. As per the NSC call scripts, marketing agents are required to inform customers that the acknowledgement email contains all information including the product rules, terms and conditions and differences between the standard product and MyPower. <p>Through examination of Horizon Power's NSC call script, we noted it does not state the requirement to obtain a clear 'yes' prior to entering a customer into a NSC. The call script could be updated to include clearer requirement to obtain verifiable customer consent to the information provided.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
133	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(2) Integrated Regional Licence, condition 6.3.1	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.	4	Through enquiries with the Retail Services Manager and examination of the NSC call script, we noted Horizon Power have controls in place to ensure information is provided to customers prior to agreeing in entering into a NSC. The NSC call script states that the customer may cancel the non-standard agreement at any time during the cooling-off period and that the customer may obtain further information including the product rules, terms and conditions and differences between the standard product and MyPower in the acknowledgement email, which is issued by the MyPower representative during the call.	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Through examination of the acknowledgement email, we noted the email lists four key documents; Customer Charter, Code of Conduct, NSC and the Buyback Terms and Conditions that the customer may obtain through the Horizon Power website. Under clause 2.3(3) of the Code of Conduct, the retailer or electricity marketing agent is taken to have given the customer the required information if they have informed the customer how the customer may obtain the information.</p> <p>Through review of the MyPower acknowledgement email, Customer Charter, and the NSC terms and conditions for MyPower for Small Use Customers (Electricity), we noted Horizon Power provide customers information on:</p> <ul style="list-style-type: none"> • How to obtain a copy of the Code; • How to obtain information electricity pricing, fees and charges; • Scope and how Horizon Power must comply with the Code; • How Horizon Power will assist if a customer experiences payment difficulties or financial hardship; • Concessions available to residential customers; • Horizon Power's 24-hour telephone number for faults and emergencies; • Contact details for multi-lingual and TTY services; • Horizon Power's enquiry and complaints process; and • Safe use of electricity. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
134	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(4) Integrated Regional Licence, condition 6.3.1 (Regional Power Corporation)	The Electricity Generation and Retail Corporation or Regional Power Corporation, or an electricity marketing agent acting on behalf of Electricity Retail Corporation or Regional Power Corporation must ensure that the information specified in subclause 2.3(4) is provided to the customer before arranging a non-standard contract.	4	<p>Through enquiries with the Retail Services Manager and examination of the NSC call script, we noted Horizon Power have controls in place to ensure information is provided to customers prior to agreeing in entering into an NSC. The NSC call script states that the MyPower product is entirely optional and the customer may revert back to the SFC at any time. Additionally, the script states that the customer may obtain further information including the product rules, terms and conditions and differences between the standard product and MyPower in the acknowledgement email which is issued by the MyPower representative during the call.</p> <p>Through examination of the acknowledgement email, we noted the email provides customers a document outlining</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>information on the differences between the MyPower Contract and the Horizon Power's SFC. Under clause 2.3(3) of the Code of Conduct, the retailer or electricity marketing agent is taken to have given the customer the required information if they have informed the customer how the customer may obtain the information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
135	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(5) Integrated Regional Licence, condition 6.3.1	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.	4	<p>Through enquiries with the Retail Services Manager and examination of the NSC call script, we noted Horizon Power have controls in place to ensure information is provided to customers prior to agreeing in entering into a NSC. The NSC call scripts state that the customer may cancel the non-standard agreement at any time during the cooling-off period after which the customer must provide verifiable consent.</p> <p>However, examination of the NSC call scripts noted that the information specified under sub clause 2(b)-(j) and sub clause 4 is provided to customers after verifiable consent has been obtained, namely:</p> <ul style="list-style-type: none"> How the customer may obtain- <ul style="list-style-type: none"> A copy of the Code; and Details on all relevant tariffs, fees, charges, alternative tariffs and service levels that may apply to the customer The scope of the Code; That a retailer and electricity marketing agent must comply with the Code; How the retailer may assist if the customer is experiencing payment difficulties or financial hardship; With respect to a residential customer, the concessions that may apply to the residential customer; The distributor's 24 hour telephone number for faults and emergencies How a residential customer may access Horizon Power's – <ul style="list-style-type: none"> Multi-lingual services; and TTY services How to make an enquiry of, or complaint to, the retailer; and General information on the safe use of electricity. 	<p>Recommendation 2/2020:</p> <p>Horizon Power to ensure information specified under sub clause 2(b)-(j) is provided to customers prior to obtaining their consent and to reflect this process as part of Horizon Power's NSC call scripts.</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.			
136	Electricity Industry Act, section 82	Code of Conduct, clause 2.4(1) Integrated Regional Licence, condition 6.3.1	A retailer or electricity marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed.	4	<p>Through enquiries with the Senior Customer Service Officer and examination of key documentation including the Horizon Power website, we noted concession details are provided to customers by the following methods:</p> <ul style="list-style-type: none"> As part of the move in process, customers who establish an account are sent an acknowledgement email and a Welcome Letter in the mail. In both the acknowledgement email and welcome letter, customers are referred to the Customer Charter which includes general concession information and informs customers on where further information on concessions can be obtained and how these are applied; and The Horizon power website provides customers with information on concession, rebates and subsidies. <p>Examination of Horizon Power's Compulsory Move In Script noted that customers are informed that details of all fees and charges are included in the Welcome Letter.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
137	Electricity Industry Act, section 82	Code of Conduct, clause 2.4(2) Integrated Regional Licence, condition 6.3.1	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power have a dedicated Computershare call centre team for the purposes of enquiries, verifications and complaints. The operating hours of the customer service call centre is 8am to 5pm (AWST) during weekdays for both residential and business customers.</p> <p>It was identified that Horizon Power contact details (including telephone number) can be found on:</p> <ul style="list-style-type: none"> Customer Charter; Horizon Power website; Financial Hardship Policy; Customer bills; Reminder notices; and Disconnection warnings 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
138	Electricity Industry Act, section 82	Code of Conduct, clause 2.5(1) Integrated Regional Licence, condition -6.3.1	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power only engaged in one marketing activity during the audit period which was in relation to the MyPower Plan offered exclusively to Broome and Port Hedland customers. The Retail Services Manager advised that Horizon Power have a dedicated MyPower team responsible for the MyPower product and that no other external parties are currently engaged by Horizon Power as “electricity marketing agents”.</p> <p>Horizon Power have processes and controls in place to ensure electricity marketing agents provide customers with appropriate complaint information. We noted all marketing agents are trained to process customer complaints and Horizon Power have a documented complaints process providing marketing agents guidance on how to process complaints. The complaints process also provide business rules in relation to handling customer complaints including the requirement to provide the ombudsman’s contact details when requested. All Horizon Power marketing agents hold a marketing identification number and will provide this to customers on request.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
139	Electricity Industry Act, section 82	Code of Conduct, clause 2.5(2) Integrated Regional Licence, condition 6.3.1	<p>A retailer or electricity marketing agent who meets with a customer face to face must:</p> <ul style="list-style-type: none"> - 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. 	4	<p>Through enquiries with the Retail Services Manager, we noted during the audit period, Horizon Power only engaged in one marketing activity which was in relation to the MyPower Project. For this project, we noted Horizon Power did not meet customers face to face for the purposes of marketing.</p> <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not met with a customer face to face for the purposes of marketing during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
140	Electricity Industry Act, section 82	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.	4	Through enquiries with the Retail Services Manager, we noted during the audit period, Horizon Power only engaged in one marketing activity which was in relation to the MyPower Project. For this project, we noted Horizon Power did not visit a person's premise for the purposes of marketing. Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not visited a person's premise for the purposes of marketing during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
141	Electricity Industry Act, section 82	Code of Conduct, clause 2.9 Integrated Regional Licence, condition 6.3.1	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.	4	Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power did not engage with an electricity marketing agent during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
142	Electricity Industry Act, section 82	Code of Conduct, clause 2.10 Integrated Regional Licence, condition 6.3.1	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.	4	Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power did not engage with an electricity marketing agent during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
145	Electricity Industry Act, section 82	Code of Conduct, clause 4.1	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.	2	Through enquiries with the Retail Services Manager, we noted Horizon Power's Velocity system is encoded to ensure that customers are not billed more than once a month, and at least once every three months. The use of AMI meters ensures that reads are made multiple times throughout the day, and uploaded to Velocity from mData21. Examination of Compliance reports for 2017/2018 and 2018/2019 indicated that Horizon Power had reported two instances in 2017/18 and four instances in 2018/19 where customers had not been invoiced within the required 90	No further action given resolution during the audit period. System error resolved during audit period through implementation of program fix and controls introduced around the monitoring of daily automated	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>days period. The breaches during the 2018/2019 period predominantly related to human errors when setting up the customer accounts. The issue was resolved in the Velocity system through a program fix to repair records within mData21 and all customers were invoiced as soon as the program fix was implemented as well as offered additional time to pay. Since February 2019, Horizon Power have further strengthened their controls through monitoring daily automated unbilled reports and weekly reporting of potential breaches.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>	unbilled reports and weekly reporting of potential breaches since February 2019.		
146	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(1)	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).	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not placed customers on a shortened billing cycles during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
147	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(2)	If a residential customer informs a retailer that the customer is experiencing payment difficulties or financial hardship and the customer is assessed as experiencing payment difficulties or financial hardship, the retailer must not place that customer on a shortened billing cycle without that customer's verifiable consent.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not placed a customers on a shortened billing cycles during the audit</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
148	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(3)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Based on enquiries held with Retail Services Manager, it was concluded that Horizon Power had not placed customers on a shortened billing cycles during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
149	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(4)	A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Based on enquiries held with Retail Services Manager, it was concluded that Horizon Power had not placed customers on a shortened billing cycles during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
150	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(5)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries held with Retail Services Manager, it was concluded that Horizon Power had not placed customers on a shortened billing cycles during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
151	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(6)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has made the business decision not to place customers on a shortened billing cycles. There are no policies or procedures in place in relation to shortened billing cycles. Should a shortened billing cycle be requested, Horizon Power would decline this service.</p> <p>The Retail Services Manager confirmed that, during the audit period, Horizon Power has not processed any requests to shorten a billing cycle as described by the code.</p> <p>Based on enquiries held with Retail Services Manager, it was concluded that Horizon Power had not placed customers on a shortened billing cycle during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
154	Electricity Industry Act, section 82	Code of Conduct, clause 4.4	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has billing processes and systems to capture both a customer's supply address and an alternate postal address. All bills are automatically issued electronically and sent to a customer's supply address unless an alternative postal address has been nominated by the customer. Both a customer's supply address and alternate postal address are captured within Velocity.</p> <p>Examination of Horizon Power's Connection Application Form determined that Horizon Power's application process captures both the supply address and the postal address, allowing customers to nominate an alternate postal address. Review of two example bills noted that bills may be issued to a customer's supply address or alternative postal address.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
155	Electricity Industry Act, section 82	Code of Conduct, clause 4.5(1)	A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer's bill, unless the customer agrees otherwise.	4	Through enquiries with the Retail Services Manager, we noted Horizon Power has procedures in place to ensure that the minimum prescribed information is included on a	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					customer's bill. All customer's bills are automatically generated through Velocity using a standard bill template. Examination of Horizon Power's standard bill template determined that it included all 30 particulars listed under clause 4.5(1) of the Code. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
156	Electricity Industry Act, section 82	Code of Conduct, clause 4.5(3)	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.	2	Through enquiries with the Retail Services Manager and walkthrough of Horizon Power billing procedures, we noted it is an automated process within Velocity that when debt transfer request is put through, the customer is notified of the amount of the historical debt and its basis in the customer's next bill. The process of identifying a customer with historical debt is often dependent on the customer self-identifying themselves as having previous debts with Horizon Power, usually from a previous supply address (es), or from searches on same account name performed by the CSRs upon account creation. Historical information, including outstanding debt, can then be automatically transferred to the new customer account within Velocity which will allow historical debt to be reflected in the customer's next bill. A historical debt will also be identified via the credit management cycle where prior to an account being referred to the mercantile agency, a Velocity check is performed for any new or existing accounts owned by the same customer. If customer has active account(s) then a full ID match or contact is required to confirm transfer debt. Sample based testing of five historical debt transfers noted that the next bills issued to customers reflected the amount of historical debt transferred as well as the basis for historical debt. Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
157	Electricity Industry Act, section 82	Code of Conduct, clause 4.6	Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following: - the distributor's or metering agent's reading of the meter at the customer's	4	Through enquiries with the Retail Services Manager, we noted through the use of AMI meters, Horizon Power has automated controls in place to base the bill on one of the outlined methods outlined below:	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			supply address; - the customer's reading of the meter in the circumstances specified in subclause 4.6(1) (b); or - if 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.		<ul style="list-style-type: none"> Horizon Power's reading of the meter at the customer's supply address; and If the connection point is a type 7 connection point, the procedure as set out in the metrology procedure or Metering Code, or as set out in any applicable law. <p>Horizon Power does not accept customer readings of meters for bills. Through the use of AMI meters, Horizon Power is able to gather actual usage consumption data at six hourly intervals, which is uploaded into mData21 systems overnight where it is subsequently validated and pushed into Velocity. Bills will then be generated on a standard bill template using the supplied actual usage data.</p> <p>Examination of a standard bill determined that Horizon Power based the bill on a meter reading generated by Horizon Power's AMI meter.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
158	Electricity Industry Act, section 82	Code of Conduct, clause 4.7	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.	3	<p>Through enquiries with the Metering Services Manager, review of relevant documentation and walkthroughs of the system, we noted Horizon Power's advanced meters (AMI) will automatically send reads into the MDR every six hours to prepare its bills. This is uploaded into mData21 overnight and removing the need for a physical inspection to prepare bills. A must read service order will be raised if there is an issue with the meter, resulting in no read being obtained. This is monitored by the Metering Services team, and when a failure is logged, an alert will be raised from mData21, requiring a Metering Services Data Engineer to raise a Service Order to those Horizon Power employees in the field. A physical read will be taken, and if required, the meter replaced.</p> <p>A recommendation was raised in the 2017 Performance Audit for Regional Managers to reinforce with staff the importance of following the annual read process and to arrange training as required for using existing monitoring and reporting mechanisms to track outstanding must read service order due dates against actual service order completion dates. It was noted by the RCM Esperance that this was resolved partly due to the roll-out of the new AMI meters, as well as reinforcing with contractors and field staff the importance of completing the service orders</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>as requested. Review of the Special Read data confirmed Service Orders are actioned within an appropriate timeframe by field staff and contractors.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
159	Electricity Industry Act, section 82	Code of Conduct, clause 4.8(1)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted the majority of Horizon Power customers are connected to AMI meters. All AMI meters provide automatic actual reads which are fed through to Horizon Power's metering system, mData21. In the instance where a customer is not connected to an AMI meter, Horizon Power will endeavour to provide a bill based on a meter reading. If Horizon Power is unable to reasonably base a bill on a reading of the meter, they will provide an estimated bill as outlined in 5.1(d) of the SFC. All customer's bills are automatically generated through Velocity using a standard and estimated bill template.</p> <p>Examination of Horizon Power's Estimated Bill template noted that Horizon Power will provide an estimated bill, that clearly states:</p> <ul style="list-style-type: none"> • That the bill is based off an estimated read; • The estimated meter reading; • The basis of estimation; • The reason for the estimation; and that the customer may request a meter reading; and • Verification of a meter reading. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
160	Electricity Industry Act, section 82	Code of Conduct, clause 4.8(2)	In circumstances where a customer's bill is estimated, a retailer must clearly specify on the customer's bill the information required under subclause 4.8(2).	4	<p>Through enquiries with the Retail Services Manager, we noted the majority of Horizon Power customers are connected to AMI meters. All AMI meters provide automatic actual reads which are fed through to Horizon Power's metering system, mData21. In the instance where a customer is not connected to an AMI meter, Horizon Power will endeavour to provide a bill based on a meter reading. If Horizon Power is unable to reasonably base a bill on a reading of the meter, they will provide an estimated bill as outlined in 5.1(d) of the SFC. All</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>customer's bills are automatically generated through Velocity using a standard and estimated bill template.</p> <p>Examination of Horizon Power's Estimated Bill template noted that Horizon Power will provide an estimated bill, that clearly states:</p> <ul style="list-style-type: none"> • That the bill is based off an estimated read; • The estimated meter reading; • The basis of estimation; • The reason for the estimation; and that the customer may request a meter reading and; • Verification of a meter reading. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
161	Electricity Industry Act, section 82	Code of Conduct, clause 4.8(3)	<p>On request, a retailer must inform a customer of the basis and the reason for the estimation.⁷</p> <p><i>Footnote: ⁷ Refer to clause 4.8(4) of the Code for a definition of an estimated bill in situations where the meter reading is partly based on estimated data (incl. interval meters).</i></p>	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power have policies and procedures in place to ensure CSRs provide customers with the basis and reason for an estimated bill. When Horizon Power is unable to base a bill on a meter reading, customers will be billed based on estimated reads, with rules pre-programmed into mData21.</p> <p>Examination of an estimated bill issued during the audit period noted that it clearly states, that on request, Horizon Power will provide customers:</p> <ul style="list-style-type: none"> • The basis of estimation; • The reason for the estimation; and that the customer may request a meter reading and; • Verification of a meter reading. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
162	Electricity Industry Act, section 82	Code of Conduct, clause 4.9	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has policies and procedures in place to ensure that if a meter is subsequently read, the retailer must include an adjustment on the next bill to take into account the actual meter reading. Velocity automates the adjustment once the actual meter reading is uploaded from mData21. The next bill will be generated with new adjusted amount.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Examination of a subsequent actual bill issued to adjust for a previous estimated read, noted that the adjustment was appropriately reflected on the actual bill. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
163	Electricity Industry Act, section 82	Code of Conduct, clause 4.10	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.	5	Through enquiries with the Retail Services Manager, we noted Horizon Power has policies and procedures in place to ensure that an estimated bill will be replaced with a bill based in an actual reading when a customer provides access to the meter and pays for any reasonable charges. It was confirmed that Horizon Power will raise a Service Order upon receiving a request from a customer to have their meter read. The Service Order is sent to field technicians who will attend the customer's supply address and provide an actual meter reading on the provision the customer provides appropriate access to the meter and pays Horizon Power any reasonable charges. It was confirmed by the Senior Customer Service Officer that Horizon Power had not been requested by a customer to replace an estimated bill with a bill based on an actual reading during the audit period. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.	N/A	A	NR
165	Electricity Industry Act, section 82	Code of Conduct, clause 4.11(2)	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.	4	Through enquiries with the Retail Services Manager it was determined that Horizon Power has processes and procedures in place to refund any reasonable charges for testing a meter to a customer if a meter is found to be defective. Should a customer contact Horizon Power in regards to a high bill or suspected faulty meter, Horizon Power will not charge the customer prior to completing the meter test. If the meter is found to be faulty, Horizon Power will refund the customer via their refund process. The Retail Services Manager confirmed there were no meters tested as faulty during the audit period. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					occurred during the audit period, therefore the obligation is not rated.			
166	Electricity Industry Act, section 82	Code of Conduct, clause 4.12(1)	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.	4	<p>Through enquiries with the Customer Services Process Manager and examination of Horizon Power's Electricity and Tariffs and Charges Brochure, we noted small-use residential customers are ineligible for alternate L2 and L4 tariffs, as they are only offered to small use business customers who meet certain eligibility criteria. On a monthly basis the RCMs manually monitor a Qlikview report that outlines whether a customer's usage entitles them to a more cost effective tariff, or whether they are no longer eligible for that tariff. Any customers affected by Variations in tariffs are informed of the variation no later than the next bill in the customer's billing cycle.</p> <p>Alternatively, there are C2, D2 and K2 tariffs available for Charitable Organisations, Not-for-profit organisations and mixed residential-business properties respectively, which customers can apply for.</p> <p>Examination of Request for Change of Tariff Rates and subsequent bill determined that a customer requesting a variation in tariff, and demonstrating that they satisfy all the conditions relating to the eligibility of the alternative tariff, was transferred to the new tariff within 10 business days.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
167	Electricity Industry Act, section 82	Code of Conduct, clause 4.13	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.	4	<p>Through enquiries with the Customer Services Process Manager, we noted on a monthly basis the RCMs manually monitor a Qlikview report that outlines whether a customer's usage entitles them to a more cost effective tariff, or whether they are no longer eligible for their current tariff. Customer's accounts are reviewed on a twelve month rolling basis. Should a customer be subject to a change in tariff, Horizon Power will inform Computershare who will generate a Change of Tariff Rates Letter which outlines:</p> <ul style="list-style-type: none"> • The current tariff the client is on; • The proposed tariff that the customer will be transferred to; and • The applicable supply charge of the proposed tariffs. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Review of Horizon Power's Change of Tariff Rates Letter and Qlikview Tariff Report determined that Horizon Power reviews tariff rate changes on a monthly basis, and provides the required written notification of the proposed change to applicable customers.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
168	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(1)	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.	5	<p>Through enquiries with the Retails Services Manager, we noted Horizon Power has procedures in place to ensure that if a customer requests a final bill, it is issued in accordance with the request. Through Horizon Power's use of AMI Meters, CSRs are able to raise a request for de-energisation and a subsequent final bill to be issued through Velocity upon request by a customer. AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address. Examination of Horizon Power Billing Overview noted that they endeavour to post the final invoice to the customer's new address, regardless of whether they are supplying to the new address. Should the customer have a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>Examination of one Move Out Request and subsequent Final Bill determined that Horizon Power used reasonable endeavours to issue a final bill in accordance with the customers move our request.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
169	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(2)	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.	4	<p>Through enquiries with the Retails Services Manager, we noted Horizon Power has procedures in place to ensure that if a customer requests a final bill, it is issued in accordance with the request. AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address and a final bill is issued accordingly. Should the customer have a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>When a final bill is issued, if an account is in credit, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run.</p> <p>Examination of an account in credit at time of closure and refund process noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve days of receiving the instructions.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
170	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(3)	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).	4	<p>Through enquiries with the Retails Services Manager, we noted Horizon Power has procedures in place to ensure that if a customer requests a final bill, it is issued in accordance with the request. AMI meters take a reading at midnight on the date the customer advises they will be vacating the supply address and a final bill is issued accordingly. Should the customer have a non-AMI meter, Horizon Power will use its best endeavours to attend the property on the day of the move out request to perform a manual final read.</p> <p>If a customer owes a debt to Horizon Power and the customer's account is in credit at the time of account closure, Horizon Power will automatically offset the debt and adjust the account accordingly. Prior to offsetting customer's debt with a credit amount, CSRs will provide customers written notice of the amount that will be offset. If any amount remains after the offset, the credit amount will appear on the final bill, and Horizon Power will contact the customer for instructions on how to transfer the remaining amount, including a refund by EFT or cheque, or credit to another account. If the customer is unable to be contacted, an automatic refund cheque is issued via the bi-weekly cheque run.</p> <p>Review of an account closed in credit, and a subsequent Credit Refund being processed noted that Horizon Power processed a refund to the customer as per the customers refund instructions.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
171	Electricity Industry Act, section 82	Code of Conduct, clause 4.15	<p>A retailer must review a customer's bill on request by the customer, subject to the customer paying:</p> <ul style="list-style-type: none"> - 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), and - any future bills that are properly due. 	4	<p>Through enquiries with the Retail Services Manager we noted Horizon Power has procedures in place should a customer request a bill review. Velocity allows for a manual suppression to be placed on a customer's entire bill should a complaint be lodged. CSR's are instructed to record a description of the complaint at the time the complaint is made and instruct the customer on how the complaint will be dealt with. The bill review will be conducted immediately if reported over the phone, with the customer agreeing to pay the portion of the bill not in dispute. If reported via the customer website, the CSR will contact the customer, and subject to the customer agreeing to pay the portion of the bill not in dispute, the review will be conducted.</p> <p>Review of a Customer Bill Review Request determined that Horizon Power raised a bill review as requested by the customer and placed the customer's on a billing suppression within adequate time frames.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
172	Electricity Industry Act, section 82	Code of Conduct, clause 4.16(1)(a)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has time frames and procedures in place to ensure that following a bill review, if the bill is found to be correct, Horizon Power may charge the unpaid amount to the customer. It was noted that Horizon Power has in place call scripts to ensure CSRs will make contact with the customers by phone or e-mail to inform them of the outcome of a bill review and that they may request a meter test, as well as the internal complaints handling process, which is detailed on their website. Additionally, they will be informed that the matter can be handled by the Ombudsman if they so wish. Once the review has been completed, the account suppression will be removed, and a bill will be generated with the account balance, including the unpaid amount if the bill is correct.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
173	Electricity Industry Act, section 82	Code of Conduct, clause 4.16(1)(b)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has procedures in place to adjust a customer's bill if a bill review is found to be incorrect. Should a bill review be incorrect, and a subsequent adjustment owing to the customer needs to be made, Horizon Power will apply this credit amount directly to the customer's account through Velocity, where bills are automatically generated showing the amount of credit applied. Customers may request to obtain a refund for the credit amount via EFT or cheque. When a request for refund is made, CSR's are trained to process EFT refunds and cheques within twelve business days of receiving the instructions.</p> <p>If it is determined that the bill relates to an amount undercharged, Horizon Power will contact the customer once the issue has been identified, and offer the following:</p> <ul style="list-style-type: none"> • Time to pay the bill through an instalment plan covering at least the period over which the undercharging occurred; • The amount shall not earn interest, unless the customer does not pay by the due date and has not entered into an instalment plan; • The amount will be limited to no more than the amount undercharged in the twelve months prior to the date on which the retailer notified the customer that undercharging occurred; and • Horizon Power will notify the customer of the amount to be recovered no later than the next bill, together with an explanation of that amount. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
174	Electricity Industry Act, section 82	Code of Conduct, clause 4.16(2)	A retailer must inform a customer of the outcome of the review of a bill as soon as practicable.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has processes in place to ensure customers are notified of the outcome of a bill review as soon as practical. It was confirmed Horizon Power that a request for a bill review is treated by Horizon Power as an expression of dissatisfaction and therefore the Complaints process is followed. The Customer Complaints Process</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>notes that all complaints must be resolved within 15 business days. When a customer complaint is raised, it is logged in Velocity with the date the complaint was received. CSR's are under guidance to make an initial response immediately or within in one business day and the resolution is to be sought within 15 days from the date the complaint was received. Velocity is designed to generate a pop-up warning message whenever an account is accessed whilst a complaint is active. If a complaint reaches ten days, an overdue notice will appear. When a bill is reviewed and a review is complete, CSR's will advise customers of the outcome of the review immediately.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
175	Electricity Industry Act, section 82	Code of Conduct, clause 4.16(3)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has processes in place to ensure customers are notified of the outcome of a bill review as soon as practicable. It was confirmed with Horizon Power that a request for a bill review is treated by Horizon Power as an expression of dissatisfaction and therefore the Complaints process is followed. The Customer Complaints Process notes that all complaints must be resolved within 15 business days. When a customer complaint is raised, it is logged in Velocity with the date the complaint was received. CSR's are under guidance to make an initial response immediately or within in one business day, with the resolution to be provided within 15 days from the date the complaint was received. Velocity is designed to generate a pop-up warning message whenever an account is accessed whilst a complaint is active. If a complaint reaches ten days, an overdue notice will appear. When a bill is reviewed and a review is complete, CSR's will advise customers of the outcome of the review immediately via their preferred communication method.</p> <p>Review of the overdue complaints report noted that one customer who had requested a bill review exceeded the 20 day notification of status period, and had been open for 114 days. We noted the complaint was still under investigation, however Horizon Power had communicated to the customer within 20 business days.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
176	Electricity Industry Act, section 82	Code of Conduct, clause 4.17(2)	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. ⁸ <i>Footnote: ⁸ Manner specified in subclause 4.17(2).</i>	4	<p>Through enquiries with the Retail Services Manager we noted any amount of undercharge will be added to a customer's existing account. When a defective meter is found to be faulty, Horizon Power will add the undercharge to the customer's account in Velocity, with the amount appearing on the customer's next bill, as well as an explanation of the amount. Horizon Power does not backdate undercharges more than twelve months. Horizon Power does not charge interest on debt, and through Velocity manual suppression systems, a late payment fee will not be applied. Should the customer require an instalment plan to repay the amount owed, Horizon Power will provide one covering a period at least equal to the period over which the recoverable undercharging occurred.</p> <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of Horizon Power attempting to recover any amount of undercharged for a defective or faulty meter, or otherwise.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
176A	Electricity Industry Act, section 82	Code of Conduct, clause 4.17(3)	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.	5	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power does not charge interest on an undercharged amount if the customer has failed to pay the amount to be recovered by the due date and has not entered into an instalment plan. Additionally, they may charge late fees should the customer not pay the amount to be recovered by the due date, with the fee automatically generated through Velocity, and appearing on the customer's next bill.</p> <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of Horizon Power attempting to recover any amount of undercharged for a defective or faulty meter, or otherwise.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					occurred during the audit period, therefore the obligation is not rated.			
177	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(2)	<p>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:</p> <ul style="list-style-type: none"> - use its best endeavours to inform the customer within 10 business days of the retailer becoming aware of the error, defect, or default; and - subject to subclauses 4.18(6) and 4.18(7), ask the customer for instructions for the credit or repayment of the amount. 	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power completes the following should a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> • Should an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must Read Service Order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and • Through Velocity, any overcharge amount will be automatically credited to the customer's account, and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque. <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible for.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
178	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(3)	A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.	3	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power completes the following should a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> • Should an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must Read Service Order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and • Through Velocity, any overcharge amount will be automatically credited to the customer's account, and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>whereby a CSR will process a refund request via EFT or cheque within 12 business days of receiving the instructions.</p> <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
179	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(4)	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.	5	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power completes the following should a customer be overcharged as a result of an error, defect or default for which they are responsible:</p> <ul style="list-style-type: none"> Should an issue with a meter be flagged by the Metering Services team, they will contact the regional offices and raise a Must Read Service Order to confirm the fault. Once the fault is confirmed, the customer will be contacted within ten business days of the original fault; and Through Velocity, any overcharge amount will be automatically credited to the customer's account, and appear on their next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque within twelve business days of receiving the instructions. If they do not receive instructions within twelve business days, they will automate the refund as a credit on the customer's account. <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
180	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(6)	Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).	3	<p>Through enquiries with the Retail Services Manager, and a walkthrough of Velocity, we noted Horizon Power endeavours to credit any amounts less than \$100 on the customer's next bill through an automatic payment to the customer's account via Velocity, with the payment appearing on the customer's next bill. If a customer wishes to receive a refund, they must notify Horizon Power, whereby a CSR will process a refund request via EFT or cheque within 12 business days of receiving the instructions. If they do not receive instructions within 12 business days, they will automate the refund as a credit on the customer's account.</p> <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
181	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(7)	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 subclauses 4.18(2) or 4.18(6), as applicable.	3	<p>Through enquiries with the Retail Services Manager, and walkthrough of relevant systems, we noted the following in regards to processing amounts overcharged for accounts in debt:</p> <ul style="list-style-type: none"> If a customer is in Financial Hardship or Payment difficulties, there will be a flag on the account to notify the CSR of the current status. If the account is flagged as this, the CSR will contact the Hardship team to discuss the amount to be credited to the customer. Horizon Power will automatically use an overcharged amount to offset a debt owed through Velocity. It will appear as a credit on the account and reflect on the customer's next bill, sufficiently providing written notice to the customer. If there is an amount remaining after offsetting the debt, Horizon Power will endeavour to contact the customer and offer a refund via EFT or cheque within twelve business days. <p>Through enquiries with the Metering Services Administrator, we noted during the audit period, there</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>were no instances of a customer being overcharged due to a default, defect, or error to a meter for which Horizon Power was responsible.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
182	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(1)	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 the requirements specified in subclause 4.19(1).	4	<p>Through enquiries with the Retail Services Manager and examination of relevant documentation, we noted the following:</p> <ul style="list-style-type: none"> Horizon Power only seeks to recover an undercharged amount that has occurred within the last 12 months, and will not backdate greater than 12 months from the date the customer has been notified of the undercharge; Through Velocity, Horizon Power will automatically apply the undercharge to the customer's account, and through the automated billing process, this amount will appear on the customers next standard bill; The customer's account will be suppressed for any credit actions for 28 days, which will negate a late payment fee; and If required, Horizon Power will offer an instalment plan to customer's covering at least the period in relation to the adjustment. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
183	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(2)	<p>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:</p> <ul style="list-style-type: none"> - use its best endeavours to inform the customer within 10 business days; and - Subject to subclauses 4.19(5) and 4.19(7), ask the customer for instructions about the repayment of the amount. 	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon has procedures to apply a credit to a customer's account in the occurrence of an adjustment or overcharge. Should a customer's meter be read, and a subsequent adjustment owing to the customer needs to be made, Horizon Power will apply this credit amount directly to the customer's account through Velocity, where bills are automatically generated showing the amount of credit applied. Customers will be informed within ten business days of the adjustment and Horizon Power will contact customers for instructions on how to transfer the remaining amount, including a refund by EFT or cheque.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>When a request for refund is made, CSR's are trained to process EFT refunds and cheques.</p> <p>Examination of an account in credit as a result of an adjustment and a subsequent Credit Refund being processed noted that Horizon Power informed customers within the timeframe specified under the Code and processed a refund to the customer as per the customers refund instructions.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
184	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(3)	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.	3	<p>Through enquiries with the Retail Services Manager, review of relevant documentation and system walkthroughs, we noted Horizon Power has refund procedures in place to ensure that if there is an adjustment owing to a customer after a meter read, a credit or refund will be applied in accordance with the customer's instructions. It is noted that Horizon Power's AMI meters can only overcharge a customer if a meter fails in the network operator's favour. Review of the Meter Test Process Map outlines that should a meter fail a test, usage will be calculated on accuracy difference. Walkthrough of Velocity noted if an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. If refund instructions are received CSRs will raise a refund within Velocity and coordinate the refund via either cheque or EFT within twelve business days of receiving the instructions.</p> <p>Examination of an account in credit as a result of an adjustment and a subsequent Credit Refund being processed noted that the customer requested a refund for the credited account and Horizon Power processed the refund within twelve business days of receiving the instructions.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
185	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(4)	If a retailer does not receive instructions under subclause 4.19(2), within 5 business days of making the request, the retailer must use	5	<p>Through enquiries with the Retail Services Manager and review of relevant documentation, we noted Horizon Power has refund procedures in place to ensure that if there is an adjustment owing to a customer after a meter</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			reasonable endeavours to credit the amount of the adjustment to the customer's account.		<p>read, a credit or refund will be applied in accordance with the customer's instructions. It is noted that Horizon Power's AMI meters can only overcharge a customer if a meter fails in the network operator's favour. Review of the Meter Test Process Map outlines that should a meter fail a test, usage will be calculated on accuracy difference. Walkthrough of Velocity noted if an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. If refund instructions are received CSRs will raise a refund within Velocity and coordinate the refund via either cheque or EFT within twelve business days of receiving the instructions. If instructions are not received, the amount overcharged will be credited to the customer's account through Velocity within five business days.</p> <p>Examination of an account in credit as a result of an adjustment and where Horizon Power did not receive customer's refund instructions within 5 business days of making the request, noted that Horizon Power credited the amount of the adjustment to the customer's account.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
186	Electricity Industry Act, section 82	Code of Conduct, clause 4.19(7)	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).	5	<p>Through enquiries with the Retail Services Manager, and review of relevant documentation, we noted that if a customer owes debt to Horizon Power, Horizon Power will offset the debt with any credit adjustment amount. Prior to offsetting customer's debt with a credit amount, CSRs will provide customers written notice of the amount that will be offset. Horizon Power will endeavour to credit any amounts less than \$100 on the customer's next bill by applying it to the customer's account through Velocity, with the amount automatically appearing on the customer's next bill. For amounts that exceed \$100, the option to receive a cheque refund must be offered to the customer. Once the request has been made, the payment will be processed within 12 business days and there is not time or monetary limit to the refund of amounts overcharged.</p> <p>Examination of an account in credit as a result of an adjustment being set off by a customer's debt, and a subsequent Credit Refund being processed, noted that Horizon Power processed a refund to the customer as per the customers refund instructions.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
187	Electricity Industry Act, section 82	Code of Conduct, clause 5.1	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.	4	<p>Through enquiries with the Retail Services Manager we noted Velocity is programmed to automatically calculate the due date of the bill to be greater than 12 business days from the dispatch date of the bill as reflected in Horizon Power's Velocity Credit Cycle.</p> <p>Examination of a standard bill example determined that there was at least 12 business days between the due date and the bill date.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
188	Electricity Industry Act, section 82	Code of Conduct, clause 5.2	Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2.	4	<p>Through enquiries with the Retail Services Manager, we noted all customer's bills are automatically generated through Velocity using a standard bill or estimated bill template.</p> <p>Review of Horizon Power's standard and estimated bill template determined that Horizon Power offers, as prescribed in 5.2, the following payment methods to customers:</p> <ul style="list-style-type: none"> • Pay in Person; • Mail; • Centrepay; • Electronically by BPay or Credit Card; and • By telephone by means of credit card or direct debit. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
189	Electricity Industry Act, section 82	Code of Conduct, clause 5.3	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.	4	<p>Through enquiries with the Retail Services Manager, we noted customers who wish to apply for a direct debit account may do so online or over the phone with a CSR. A Direct Debit Form is required to be completed regardless of how a customer applies for a direct debit account, and returned to Horizon Power to constitute verifiable consent.</p> <p>Review of one direct debit customer during the audit period noted that a direct debit form was obtained</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>accordingly, which included a customer's signature, dates of entry into the facility and frequency.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
190	Electricity Industry Act, section 82	Code of Conduct, clause 5.4	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.	4	<p>Through enquiries with the Retail Services Manager and review of key documents, we noted Horizon Power has procedures in place to allow customers to make advance payments. Customers are entitled to pay any amount in advance and there is no minimum requirement. Customers can make an advance payment which will be credited to their account on Velocity, and is automatically applied to the next bill to offset any future amounts.</p> <p>Examination of Horizon Power's Financial Hardship Policy outlines that Horizon Power will accept payments in advance at no additional cost.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
191	Electricity Industry Act, section 82	Code of Conduct, clause 5.5	If, due to illness or absence, a residential customer is unable to pay by way of the methods described in clause 5.2, a retailer must offer to redirect the customer's bill to a third person at no charge.	4	<p>Through enquiries with the Retail Services Manager and examination of documents, we noted Horizon Power will redirect a customer's bill to an alternate mailing address, at the request of a customer and with approval from the third person at no charge.</p> <p>Examination of the Horizon Power's SFC, NSC and Financial Hardship Policy determined that Horizon Power outlines the ability for customers to redirect their bill to a third party in the event a customer is having payment difficulties or experiencing financial hardship. Horizon Power's Financial Hardship Procedure defines payment difficulties as including 'personal illness causing minor financial issues' and instructs Horizon Power employees to offer this service to customers, should they require it.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
192	Electricity Industry Act, section 82	Code of Conduct, clause 5.6(1)	A retailer must not charge a residential customer a late payment fee in the	4	Through enquiries with the Retail Services Manager, we noted Horizon Power has procedures in place to ensure that late payment fees are not charge in the following	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			circumstances specified in subclause 5.6(1).		<p>circumstances as outlined in 5.6(1) through a 28 day manual account suppression on the customer's account:</p> <ul style="list-style-type: none"> If a residential customer has an unresolved complaint related to the non-payment of a bill to Horizon Power or the electricity ombudsman or a resolved complaint in their favour; If a customer is deemed to be having financial hardship; or If a customer has a payment extension and has paid the bill by the new due date or an instalment plan in place and they are making payments in accordance with the details of the plan. <p>Following the 28 day manual account suppression:</p> <ul style="list-style-type: none"> CSRs will place a manual calendar reminder to review the complaint prior to the lapse of 28 days manual account suppression and extend the account suppression if necessary; If after the 28 day period, Horizon Power has assessed a customer to be experiencing payment difficulties or financial hardship, a flag will remain on the customer's account refraining Horizon Power from charging a late payment fee. For accounts registered under a concession, Velocity has inbuilt system controls attached to customers' accounts to ensure customers are not charged a late payment fee, provided the customer has not received two or more reminder notices in the previous twelve months. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
193	Electricity Industry Act, section 82	Code of Conduct, clause 5.6(2)	If a retailer has charged a late payment fee in the circumstances set out in subclause 5.6(1) (c) because the retailer was not aware of the complaint, the retailer must refund the late payment fee on the customer's next bill.	4	<p>Through enquiries with the Retail Services Manager and review of relevant documentation, we noted Horizon Power has procedures in place to ensure that late payment fees are not charged in the following circumstances as outlined in 5.6(1) through a 28 day manual account suppression on the customer's account:</p> <ul style="list-style-type: none"> If a residential customer has an unresolved complaint related to the non-payment of a bill to Horizon Power or the electricity ombudsman or a resolved complaint in their favour. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>If a late payment fee was processed prior to Horizon Power becoming aware of the complaint, they will process a refund via a credit adjustment to the customer's account, which will appear on their next bill.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
194	Electricity Industry Act, section 82	Code of Conduct, clause 5.6(3)	A retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	4	<p>Through enquiries with the Retail Services Manager and review of relevant documentation, we noted Velocity has inbuilt coded controls to ensure that a customer does not receive two late payment fees in relation to the same bill within five business days of each other. The Retail Services Manager confirmed this had not occurred during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
195	Electricity Industry Act, section 82	Code of Conduct, clause 5.6(4)	A retailer must not charge a residential customer more than 2 late payment fees in relation to the same bill or more than 12 late payment fees in a year.	4	<p>Through enquiries with the Retail Services Manager, we noted Velocity has inbuilt coded controls to ensure that a customer does not receive more than two late payment fees in relation to the same bill or more than twelve late payment fees in a year.</p> <p>Review of the Customer Billing Log outlining the late payment fees received, noted that the two late payment fees applied to the customer's account are applied to two separate invoice statements.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
196	Electricity Industry Act, section 82	Code of Conduct, clause 5.6(5)	If a residential customer has been assessed as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to this customer's last bill prior to the assessment being made.	4	<p>Through enquiries with the Retail Services Manager, we noted where a customer is assessed as being in financial hardship, a manual 28 day suppression will be placed on the account to ensure no late payment fees or charges are placed on the customer account. This removes the customer from the credit cycle, mitigating any new late payment fees. If there is a late payment fee currently on the account, it will be automatically removed by the suppression.</p> <p>Examination of the 2017-2018 Annual Compliance Report noted that there were 132 instances during the period</p>	<p>No further action given resolution during the audit period.</p> <p>Since January 2019, Management introduced a Hardship flag coded into Velocity to identify customers on Hardship.</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>where late payment fees charged on a customer's last bill were not waived. It is noted the hardship flag was introduced in January 2019, with no subsequent non-compliances noted.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
197	Electricity Industry Act, section 82	Code of Conduct, clause 5.7(1)	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).	2	<p>Through enquiries with the Retail Services Manager, we noted customers have the option of either completing a move out request online, or by contacting a CSR and requesting disconnection over the phone. Once the request has been received, the CSR will raise a move-out notice on Velocity, which in turn raises a service order in mData21 to de-energise the supply address at midnight of the date the customer advised they were vacating the premises. We noted the following:</p> <ul style="list-style-type: none"> • If a customer provides five days' notice of their departure, they are not charged for electricity consumed from the date they vacated the supply address; and • If a customer does not provide five days' notice, they will be disconnected within five days of Horizon Power receiving the request. <p>Sample testing was conducted and we noted Horizon Power does not charge a customer who has vacated a supply address for the electricity consumed at the address in the circumstances identified in subclause 5.7(1).</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
198	Electricity Industry Act, section 82	Code of Conduct, clause 5.7(2)	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	4	<p>Through enquiries with the Retail Services Manager and review of Horizon Power's SFC, we noted where a customer informs Horizon Power of their eviction or otherwise requirement to vacate a supply address, they will not charge the customer for electricity consumed from the date that the customer gave notice. Once informed by the customer, the CSR will raise a move-out notice on Velocity, which in turn raises a service order in mData21 to de-energise the supply address at midnight of</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			customer gave the notice to the retailer.		<p>the date the customer advised they were evicted or required to vacate the premises. Where needed, Horizon Power may also utilise the AMI meter reads in mData21 to backdate the customer's bill to the date the customer provided Horizon Power notice.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
199	Electricity Industry Act, section 82	Code of Conduct, clause 5.7(4)	Notwithstanding subclauses 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).	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power has policies and procedures in place to ensure the following:</p> <ul style="list-style-type: none"> A previous customer is not made to pay for electricity consumed at the supply address once Horizon Power has entered into a contract with a new customer. When a move out request has been received, CSR's raise a move-out notice in Velocity, which generates a service order from Velocity to mData21 to automatically de-energise the supply address at midnight of the date the customer advised they will be vacating the supply address. The service order raised through Velocity to mData21, will also raise a final read request, which will be issued by the AMI meter at midnight on the date the customer advised they will be vacating the supply address. A customer will not be charged for electricity used post this final read. Velocity has controls in place to prevent two open accounts with the same NMI meter number at any time – an old account with an NMI number must be closed before a new account can be opened with the same NMI number – thereby preventing a previous customer being billed for consumption from the new contract. Should an address be disconnected, the CSR's will raise a disconnection notice in Velocity, which generates a service order from Velocity to mData21 to automatically de-energise the supply address at midnight of the date of disconnection. The service order raised through Velocity to mData21, will also raise a final read request, which will be issued by the AMI meter at midnight on the date the disconnection is to be processed. A customer will not be charged prior to this final read. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> During the audit period, there were no other retailers responsible for the supply of electricity to any of Horizon Power's supply addresses. <p>Examination of a move out request and a subsequent final bill noted that the customer was only billed for the usage up to the move out date requested.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
200	Electricity Industry Act, section 82	Code of Conduct, clause 5.8(1)	A retailer must not commence proceedings to recover a debt - a) from a residential customer who has informed the retailer in accordance with clause 6.1(1) that they are experiencing payment difficulties or financial hardship, unless and until the retailer has complied with all the requirements of clause 6.1 and (if applicable) clause 6.3; and b) while a residential customer continues to make payments under an alternative arrangement.	4	<p>Through enquiries with the Retail Services Manager and examination of key documents, we noted Horizon Power has policies in place to ensure they do not attempt to commence proceedings to recover a debt from a customer experiencing payment difficulties or financial hardship. Horizon Powers Financial Hardship Policy notes that Horizon Power will temporarily suspend credit actions, including disconnection and debt recovery procedures for a period of 28 days from notification to Horizon Power of payment difficulties or financial hardship. Horizon Power will place a manual suppression on accounts experiencing payment difficulties to halt the debt recovery process during the 28 day period. If, after the 28 day period, Horizon Power has assessed a customer to be experiencing payment difficulties or financial hardship, a flag will remain on the customer's account refraining Horizon Power from commencing debt recovery proceedings.</p> <p>Prior to customer's being referred to Horizon Power's debt collection agency, Horizon Power will endeavour to contact customers, ensuring Horizon Power makes reasonable efforts to determine whether a customer is in financial hardship or having payment difficulties.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
201	Electricity Industry Act, section 82	Code of Conduct, clause 5.8(2)	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	4	<p>Through enquiries with the Retail Services Manager, we noted Velocity is designed to ensure that there cannot be two open accounts at any time with the same NMI number. Velocity requires a previous account to be closed, with another reopened should a new customer move into the supply address. Debt is not transferred to the new account, therefore the debt cannot be recovered from the</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			supply of electricity to that supply address.		<p>new customer. The debt will remain on the closed account and registered against the previous account owner.</p> <p>Review of a customer bill with an overdue amount determined that Horizon Power endeavoured to only recover an outstanding debt from a customer who entered into a contract for the supply address.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
201A	Electricity Industry Act, section 82	Code of Conduct, clause 5.8(3)	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt providing the retailer obtains the other customer's verifiable consent to the transfer.	5	<p>Through enquiries with the Retail Services Manager, we noted there are processes in place within Velocity to transfer the debt from one customer to another. Horizon Power only allows legal paperwork such as Power of Attorney as recognised approval of a third party, or alternatively the person can be authorised by the account holder to redirect the bill. All authorisation is stored within Velocity – and debt transfer is coordinated within velocity.</p> <p>Review of one bill with a transfer of debt determined that Horizon Power transferred debt owed by a customer to a third party as instructed, and clearly outlined this as a credit line in the customer's bill.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
202	Electricity Industry Act, section 82	Code of Conduct, clause 6.1(1)	If a residential customer informs a retailer that the residential customer is experiencing payment problems, a retailer must assess whether the residential customer is experiencing payment difficulties or financial hardship within 5 business days; or, if the retailer cannot make the assessment within 5 business days, refer that customer to a relevant consumer representative to make the assessment.	2	<p>Through enquiries with the Senior Customer Service Officer, we noted Horizon Power will perform an assessment of financial hardship when a retail customer informs them of payment difficulties. Calls from customers are received by a Computershare CSR who will note the preliminary details of the customer's payment problems and apply a credit control suppression to the customer's Velocity account, suspending credit activities for 28 business days. CSRs inform the customer that the Senior Customer Service Officer will contact them for further details. At the end of each day, Computershare send the Senior Customer Service Officer a list of Financial Hardship queries that occurred.</p> <p>The Senior Customer Service Officer will then call each customer to obtain further details. If the Senior Customer Service Officer determines the customer's situation is applicable to the HUGS, a HUGS application is submitted</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>to the Department of Communities (DoC) website. Where the DoC informs Horizon Power the customer's application is denied, the Senior Customer Service Officer will call the customer to inform them the application was unsuccessful. Horizon Power aim to complete this process within 2 business days, which is within the 5 business days timeframe required by the Code.</p> <p>We noted the below documentation and guidance is provided to assist in ensuring that the appropriate assessment is performed in line with the timeframes stipulated in the Code:</p> <ul style="list-style-type: none"> • The Financial Hardship Procedure is provided to Horizon Power and Computershare staff. This procedure outlines the guidelines, responsibility and obligations in the treatment of customer experiencing financial hardship as required by the Code. Examination of this procedure revealed that the procedure still state the assessment must be performed within 3 business days. The Senior Customer Service Officer noted this has intentionally not been changed, as internally, Horizon Power aim to complete the process within 2 business days; • A suite of training modules is offered to CSRs, included in this suite of training is a module on HUGS. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis; • Work Instruction – Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on applying, monitoring, reporting and processing HUGS; and • CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. <p>Sample testing of call recordings of residential customers experiencing payment difficulties or financial hardship during the audit period noted all assessments either occurred during the initial call made by the residential customer or within five business days if referred to the Senior Customer Service Officer. It was confirmed with</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>the Senior Customer Service Officer that no customers were referred to a relevant consumer representative during the audit period as all assessments were made by Horizon Power within 5 business days.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
203	Electricity Industry Act, section 82	Code of Conduct, clause 6.1(3)	When undertaking an assessment under subclause 6.1(1) (a), a retailer must give reasonable consideration to the information prescribed in subclause 6.1(3) (a), or advice prescribed in subclause 6.1(3) (b), unless a retailer adopts an assessment from a relevant consumer representative.	2	<p>Through enquiries with the Senior Customer Service Officer, we noted initial assessments of payment difficulty or financial hardship are performed by Computershare CSRs. Through enquiries and examination of documentation, we noted the below processes and documents assist in ensuring that CSRs conduct assessment and give reasonable consideration to information provided by the customer as well as any advice provided any relevant consumer representatives:</p> <ul style="list-style-type: none"> • Work Instruction – Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on applying, monitoring, reporting and processing HUGS; • A suite of training modules is offered to CSRs, included in this suite of training is a module on HUGS. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis; and • CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • Consideration was given to information given by the customer and held by Horizon Power; and • The samples tested were requests made by the residential customers directly, rather than a relevant consumer representative. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
204	Electricity Industry Act, section 82	Code of Conduct, clause 6.1(4)	Upon request, a retailer must advise a residential customer of the details and outcome of an assessment carried out under subclause 6.1(1).	2	<p>Through examination of the HUGS Evaluation Register and discussions with the Senior Customer Service Officer, we noted the following:</p> <ul style="list-style-type: none"> If a customer is experiencing payment difficulties, the assessment will be conducted immediately, and the customer informed of the outcome of the assessment on the same call. If a customer is experiencing payment difficulties and qualifies for financial hardship, the initial assessment is conducted immediately, with the details provided to the Senior Customer Service Officer to complete the application. An assessment will be conducted within five business days, and an application submitted to the DoC for the HUGS program. Once the assessment has been completed by the DoC, the outcome is communicated through to the Senior Customer Service Officer who will provide this information to the residential customer. <p>CSRs are provided with the following materials to guide this process:</p> <ul style="list-style-type: none"> Work Instruction – Hardship Utilities Grants Scheme (HUGS), provides CSR with guidance on applying, monitoring, reporting and processing HUGS; A suite of training modules is offered to CSRs, included in this suite of training is a module on HUGS. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis; and CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Residential customers experiencing payment difficulties were informed of the outcome of their assessment during the initial call to Horizon Power. Residential customers experiencing payment difficulties who qualified for financial hardship were contacted by the Senior Customer Service Officer with the outcome of the assessment. <p>We noted, that during the period, no residential customer requested details and outcome of the assessment carried out under subclause 6.1(1).</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
205	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(1)	If a residential customer is referred to a relevant consumer representative under subclause 6.1(1) (b), a retailer must grant a temporary suspension of actions for that customer.	2	<p>Through enquiries with Senior Customer Service Officer, we noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account. If an assessment cannot be made within five business days and the account is to be referred to a relevant consumer representative to make the assessment, the temporary credit control suspension will continue to be in effect. This guidance is given to CSRs via the following avenues:</p> <ul style="list-style-type: none"> Work Instruction – Hardship Utilities Grants Scheme (HUGS), explains that once a HUGS application has been lodged, the customer is to receive a 28 day account suppression A suite of training modules is offered to CSRs, included in this suite of training is a module on HUGS. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis; and CSRs have access to the Horizon Power Hardship and HUGS Overview. This document 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>provides a high level definition and overview of the hardship/HUGS process.</p> <p>It was confirmed with the Senior Customer Service Officer that no customers were referred to a relevant consumer representative during the audit period as all assessments were made by Horizon Power within 5 business days.</p> <p>Based on enquiries, examination of documentation and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
206	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(2)	A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions if the customer informs the retailer about payment problems under clause 6.1 and the customer demonstrates that an appointment with a relevant consumer representative has been made.	2	<p>Through enquiries with Senior Customer Service Officer, we noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account. Horizon Power do not require the customer to demonstrate that an appointment with a relevant consumer representative has been made, rather they will apply a temporary suspension of actions as soon as the customer informs them of their payment problems. This guidance is given to CSRs via the following avenues:</p> <ul style="list-style-type: none"> • Work Instruction – Hardship Utilities Grants Scheme (HUGS), explains that once a HUGS application has been lodged, the customer is to receive a 28 day account suppression • A suite of training modules is offered to CSRs, included in this suite of training is a module on HUGS. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis; and • CSRs have access to the Horizon Power Hardship and HUGS Overview. This document provides a high level definition and overview of the hardship/HUGS process. <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship. Of the samples tested, all requests were given a temporary suspension of actions by manually suppressing customer accounts for 28 days.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
207	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(3)	A retailer must allow a temporary suspension of actions for a period of at least 15 business days.	2	<p>Through enquiries with Senior Customer Service Officer it was noted when a CSR is informed of a customer's payment difficulties and the customer indicates an intention to apply for HUGS the CSR will always apply a temporary credit control suppression to the customer's Velocity account. The CSR does not enter the number of days the account is to be suspended for, Velocity is programmed to apply a 28 day suppression once the button is clicked in the system. We noted this temporary suppression applied is more than the required of at least 15 business days stipulated in the Code.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and all were suppressed for a 28 day period.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
208	Electricity Industry Act, section 82	Code of Conduct, clause 6.2(4)	A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative to allow additional time to assess a residential customer's capacity to pay.	2	<p>Through enquiries with the Senior Customer Service Officer and review of the Financial Hardship Procedure, customers are initially placed on a 28 business day account suppression for all account activities to allow additional time to assess a residential customer's capacity to pay. Should further time be required, the customer request will be forwarded to the Manager Customer Service for an extension. Generally, the customer will be granted another 28 business days, providing they can cite a reasonable need for extension.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Of the samples tested, all requests were given additional time to assess customer's capacity to pay by manually suppressing customer accounts for 28 days. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> As all assessments were made within the 28 day period, further extensions were not requested by the customers <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
209	Electricity Industry Act, section 82	Code of Conduct, clause 6.3(1)(a)	If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy, we noted Horizon Power have a process in place to provide assistance to customers who are assessed as experiencing payment difficulties. An overview of the assistance provided to financial hardship and payment difficulties customers when applicable is outlined below:</p> <ul style="list-style-type: none"> Additional time to pay a bill through the application of an account suppression. This suppression will suspend all of the customer's credit activities for 28 business days. Advise customers that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship Offer the option to enter into a payment arrangement plan. <p>Customers are offered these options over the phone by the CSRs or Credit team when they call about payment difficulties or financial hardship.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties and the following was noted:</p> <ul style="list-style-type: none"> All customers were offered an interest-free payment plan All customers were advised that additional assistance may be available if the customer is unable to meet the conditions of the payment plan due to financial hardship Of the five samples, two were not offered additional time to pay a bill, but rather 	<p><u>Recommendation 3/2020:</u></p> <p>Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties as part of their call scripts.</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>immediately offered an interest-free payment plan.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
210	Electricity Industry Act, section 82	Code of Conduct, clause 6.3(1)(b)	If a residential customer is assessed as experiencing financial hardship, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1) (b) and assistance in accordance with clauses 6.6 to 6.9.	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy, we noted Horizon Power have a process in place to provide assistance to customers who are assessed as experiencing financial hardship. An overview of the assistance provided to financial hardship customers when applicable is outlined below:</p> <ul style="list-style-type: none"> • Consideration of a reduction in fees, charges and debt on request • Consideration of revising alternative payment options • Consideration to a partial debt reduction • Additional time to pay a bill. • An interest and fee free payment plan or other arrangement where you are given additional time to pay a bill or pay arrears. • Provision of information relevant to the hardship application. <p>Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • Customers were offered an interest and fee free payment plan or other arrangement where they are given additional time to pay a bill or pay arrears. • Consideration was made to the following: <ul style="list-style-type: none"> • Reduction in fees, charges and debt • Alternative payment options 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Partial debt reduction through a HUGs application Customers were informed of: <ul style="list-style-type: none"> The right to have a bill redirected at no charge; Payment methods available; Information on applicable tariffs; Information on concessions (including HUGs) that may be available and how to access them; and The availability of financial counselling services. Customers had a minimum payment in advance amount determined by their capacity to pay <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
211	Electricity Industry Act, section 82	Code of Conduct, clause 6.4(1)(a)	If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer additional time to pay a bill.	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, additional time to pay a bill. This will be processed through Velocity by a CSR, by placing a 28 day suspension of activities on the customer account. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Of the five samples, two were not offered additional time to pay a bill, but rather immediately offered an interest-free payment plan or a HUGs application. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement</p>	<p><u>Recommendation 4/2020:</u></p> <p>Horizon Power to include the requirement for CSRs to offer payment extensions in addition to payment plans for those customers experiencing payment difficulties or financial hardship as part of their call scripts.</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.			
212	Electricity Industry Act, section 82	Code of Conduct, clause 6.4(1)(b)	If a residential customer is experiencing payment difficulties or financial hardship, a retailer must offer the residential customer an interest-free and fee-free instalment plan or other arrangement under which the residential customer is given additional time to pay a bill or to pay arrears (including any disconnection and reconnection charges), while being permitted to continue consumption.	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy, and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship various payment arrangements. These will be processed through Velocity, with a CSR placing a 28 day suspension of activity on the account to assist with the payment arrangement. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> All customers were offered a payment arrangement in line with the Code of Conduct. The minimum amount to be paid was discussed with the customer, with the CSR taking into account the customers' ability to pay within a certain timeframe <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
213	Electricity Industry Act, section 82	Code of Conduct, clause 6.4(2)	When offering or amending an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must comply with subclause 6.4(2).	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, we noted Horizon Power will offer customers experiencing payment difficulties or financial hardship, various payment arrangements. These include customised payment plans (max 12 months) that accommodate particular customer circumstances, utilising the system tools, business rules and work instructions that have been provided, e.g. take into consideration a customer that is struggling to meet bill payments, such as, a single parent with dependent children.</p> <p>Payment arrangements will be processed through Velocity, with a CSR placing a 28 day suspension of</p>	<p>No further action given resolution during the audit period.</p> <p>The letter template contained the terms of the payment arrangement plan and the importance of contacting Horizon Power for further assistance if they cannot meet the financial obligations has been updated to</p>	A	3

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>activity on the account to assist the customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Once a payment arrangement has been processed on a customer account, a Payment Arrangement Letter is automatically issued via email, containing the details of the agreed upon arrangement. If the customer does not have an email address, it is issued via mail. If a payment arrangement has been altered, the system will issue another Payment Arrangement Letter containing the new details.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • All customers were offered a payment arrangement in line with the Code of Conduct. The minimum amount to be paid was discussed with the customer, with the CSR taking into account the customers' ability to pay within a certain timeframe. • All customers were issued a Payment Arrangement letter within the five business day timeframe. • None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. • Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that</p>	include the consequence of not adhering to the terms of the arrangement.		

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.			
214	Electricity Industry Act, section 82	Code of Conduct, clause 6.4(3)	If a residential customer accepts an instalment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 6.4(3)(a) within 5 business days, and notify the residential customer of any amendments to the instalment plan at least 5 business days before they come into effect.	2	<p>Through enquiries with the Senior Customer Services Officer and examination of the Velocity system, we noted Horizon Power will provide customers with confirmation of their payment arrangement within five business days. We noted once a payment arrangement plan has been set up through Velocity and agreed with the customer, the system automatically triggers a Payment Arrangement Confirmation letter to be generated and sent to the customer. Training is provided to CSR's covering the process for assessing customers in regards to payment difficulties and financial hardship, with a training register used to monitor the completion of these modules.</p> <p>Sample testing was conducted over calls made by customers enquiring about payment difficulties or financial hardship and the following was noted:</p> <ul style="list-style-type: none"> All customers were issued a Payment Arrangement letter within the five business day timeframe. None of the customers received an altered Payment Arrangement Letter as their arrangement did not change. Of the samples selected, one of the Payment Arrangement Letters issued in May 2017 did not contain reference to the consequences of not adhering to the payment arrangement. It was noted by the Senior Customer Service Officer that this was rectified in August 2017. <p>A non-compliance was raised in the 2017 Performance Audit in relation to the Payment Arrangement Letter template as it did not contain reference to the consequences of not adhering to the payment arrangement. The Senior Customer Service Officer noted this was rectified in August 2017.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with</p>	<p>No further action given resolution during the audit period.</p> <p>The letter template contained the terms of the payment arrangement plan and the importance of contacting Horizon Power for further assistance if they cannot meet the financial obligations has been updated to include the consequence of not adhering to the terms of the arrangement.</p>	A	3

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					the obligation during the audit period, resulting in a moderate impact on customers or third parties.			
215	Electricity Industry Act, section 82	Code of Conduct, clause 6.6(1)	A retailer must give reasonable consideration to a request by a customer experiencing financial hardship, or a relevant consumer representative, for a reduction of the customer's fees, charges or debt.	2	<p>Through enquiries with the Senior Customer Service Officer and review of the Financial Hardship Procedure, we noted the following is taken into consideration when reviewing the customer's request to reduce their fees charges or debts:</p> <ul style="list-style-type: none"> The customer's willingness to receive energy efficiency information, and If the customer can meet their payment obligations for three consecutive weekly/fortnightly payments by the due date on their hardship payment plan and are willing to, or have sought financial counselling as and when required. <p>Each customer request will be individually assessed by the Senior Customer Service Officer and sent to the Retail Services Manager for approval. In such cases where the customer meets these requirements a maximum of 25% of their current outstanding debt may be waived.</p> <p>Sample testing was conducted over calls made by customers experiencing financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Horizon Power took into account their willingness to receive energy efficiency information and asked if they have sought financial counselling. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
216	Electricity Industry Act, section 82	Code of Conduct, clause 6.6(2)	In giving reasonable consideration under subclause 6.6(1), a retailer should refer to the hardship procedures referred to in subclause 6.10(3).	2	<p>The Senior Customer Service Officer advised that both Horizon Power and Serviceworks staff have access to the Financial Hardship Procedure. Upon examination of the procedure we noted the following points are reflected in the document:</p> <ul style="list-style-type: none"> Horizon Power is committed to helping customers experiencing financial hardship to better manage their electricity account where they have demonstrated: 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> They are willing to receive energy efficiency information and/or They can meet their payment obligations for three consecutive weekly/fortnightly payments by the due date on their hardship payment plan and are willing to, or have sought financial counselling as and when required. <p>Additionally, Appendix A in the procedure also includes an extract of the relevant clauses from the Code relating to financial hardship and payment difficulties.</p> <p>Sample testing was conducted over calls made by customers experiencing about financial hardship and the following was noted:</p> <ul style="list-style-type: none"> Horizon Power took into account their willingness to receive energy efficiency information and asked if they have sought financial counselling. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
217	Electricity Industry Act, section 82	Code of Conduct, clause 6.7	If it is reasonably demonstrated to a retailer that a customer experiencing financial hardship is unable to meet the customer's obligations under a payment arrangement, the retailer must give reasonable consideration to offering the customer an instalment plan or revising an existing instalment plan.	2	<p>Through enquiries with the Senior Customer Service Officer, we noted where a customer experiencing financial hardship is unable to meet the financial obligations under a previously elected payment arrangement plan Horizon Power will give reasonable consideration to offering the customer a revised payment arrangement plan. In the event this occurs, Horizon Power do not amend the existing payment arrangement plan, instead the previous plan is ceased and a new revised payment arrangement plan is created.</p> <p>When a customer informs Horizon Power they are unable to meet the obligations of a payment arrangement, the arrangement will be cancelled. When a customer breaks the payment arrangement terms, Velocity will automatically end the arrangement and issue the customer a Broken Payment Arrangement Letter. An example of this letter was obtained and we noted it instructs the customer to contact Horizon Power if the customer is having difficulty making payment.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Sample based testing was performed on customers experiencing payment difficulties, and we noted when the customer had broken a payment arrangement or informed Horizon Power of inability to meet the financial obligations of the payment arrangement, the customer was subsequently offered a revised payment arrangement.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
218	Electricity Industry Act, section 82	Code of Conduct, clause 6.8	A retailer must advise a customer experiencing financial hardship of the information specified in subclause 6.8(1).	2	<p>Through enquiries with the Senior Customer Service Officer and examination of the Financial Hardship Policy and Financial Hardship Procedure, as well as observation of phone call recordings and comments within Velocity, we noted Horizon Power have a process in place to ensure that customers who are assessed as experiencing financial hardship are advised of:</p> <ul style="list-style-type: none"> • The right to have a bill redirected at no charge; • Payment methods available; • Information on applicable tariffs; • Information on concessions (including HUGS) that may be available and how to access them; and • The availability of financial counselling services. <p>The Senior Customer Service Officer and Retail Services Manager advised that only one type of meter (advanced meter) is offered to small use customers. It was also noted that during the audit period, no financial hardship customers instructed Horizon Power to redirect a bill to a third person. Additionally, through examination of an example residential customer bill, reminder notice and disconnection warning, we noted all billing related documents include information on the payment methods available to customers.</p> <p>Sample testing was conducted over calls made by customers experiencing about financial hardship and the following was noted:</p> <ul style="list-style-type: none"> • Horizon Power advised the customer of the following: 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The right to have a bill redirected at no charge; Payment methods available; Information on applicable tariffs; Information on concessions (including HUGS) that may be available and how to access them; and The availability of financial counselling services. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
219	Electricity Industry Act, section 82	Code of Conduct, clause 6.9(1)	A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representatives, as referred to in subclause 5.4(3).	2	<p>Through enquiries with the Senior Customer Service Officer, we noted Horizon Power does not prescribe a minimum payment in advance amount for any residential customers experiencing financial hardship or payment difficulties. Instead, they will agree upon an amount with the customer which closely aligns with the customer's consumption average. It was confirmed that Horizon Power regularly receive calls from financial counsellors and will engage in a three way conversation with residential customers experiencing payment difficulties or financial hardship. Horizon Power, in consultation with consumer representatives, will look at customer's current debt levels and consumption usage over the past year to determine the most suitable payment plan.</p> <p>Sample testing was conducted and we noted that where appropriate, minimum payment in advance amounts was determined in consultation with relevant consumer representatives.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
220	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(1)	A retailer must develop a hardship policy and hardship procedures to assist customers experiencing financial hardship to meet their financial obligations and	4	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have developed a Hardship Policy and Procedures to assist customers experiencing financial hardship. Both the Policy and Procedures were last</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			responsibilities to the retailer.		<p>amended and submitted to the Authority for review in June 2015. Additionally, Horizon Power have developed a HUGS and Hardship Overview guideline which is used in conjunction with the Hardship Procedure and used by the call centre to identify customers experiencing hardship.</p> <p>Horizon Power's Hardship Policy and Procedures have been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA. It is the Senior Customer Service Officer's responsibility to maintain and update both documents, with amendments requiring approval from the Retail Services Manager and the Manager Customer Service.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
221	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(2)	A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2).	2	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship. Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015.</p> <p>Horizon Power's Hardship Policy and Procedures have been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA. It is the Senior Customer Service Officer's responsibility to maintain and update both documents, with amendments requiring approval from the Retail Services Manager and the Manager Customer Service. The Hardship Policy is available on the Horizon Power website and available in large print copy on request. The Hardship Policy was examined and it was determined that the policy includes statements referring to all of the criteria within Clause 6.10(2) of the Code of Conduct including:</p> <ul style="list-style-type: none"> • Encouraging customers to contact Horizon Power as soon as possible if customers are having difficulty paying their bill; • Clearly stating that customers will be treated sensitively and with respect; • How Hardship customers are eligible for consideration of a reduction in fees, charges and debt on request 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The WA Economic Regulation Authority definition of financial hardship; An overview of the assistance and services made available to customers experiencing financial hardship or payment difficulties as required by the Code; The option to make payment via Centrepay; An overview of available rebates and subsidies and where to obtain more information on concessions; Information on the availability of Interpreter and TTY services; Clearly stating that call centre staff are training to assist customers in a confidential manner and that Horizon Power will respect customer's privacy at all times. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
222	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(3)	A retailer must ensure that its hardship procedures comply with the criteria specified in subclause 6.10(3).	2	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship. Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015.</p> <p>Horizon Power's Hardship Policy and Procedures have been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA. It is the Senior Customer Service Officer's responsibility to maintain and update both documents, with amendments requiring approval from the Retail Services Manager and the Manager Customer Service. The Financial Hardship Procedure was examined and the following observations were made:</p> <ul style="list-style-type: none"> The procedure provides training to Horizon Power and Computershare staff on issues relating to financial hardship, its impacts and how to deal sensitively and respectfully with customers experiencing financial hardship; The procedure includes guidance and/or reference in relation to: 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Identifying customers who are experiencing financial hardship; Assessing the residential customer's electricity usage and capacity to pay when creating a payment arrangement plan; Suspension of disconnection and debt recovery activities for customers experiencing financial hardship; Debt waiving activities; and Debt recovery activities <ul style="list-style-type: none"> The procedure requires credit team staff have a direct telephone number and that number be provided to relevant consumer representatives <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
223	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(4)	If requested, a retailer must give residential customers and relevant consumer representatives a copy of the retailer's hardship policy, including by post, at no charge.	4	<p>Through enquiries with the Senior Customer Service Officer, we noted the Financial Hardship Policy is available on the Horizon Power website, and residential customers or relevant consumer representatives will be directed to the website to obtain a copy. If requested, a copy of the Financial Hardship Policy will also be provided to residential customers or relevant consumer representatives by email or mail at no charge.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
225	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(6)	If directed by the ERA, a retailer must review its hardship policy and hardship procedures in consultation with relevant consumer representatives and submit the results of that review to the ERA within 5 business days after it is completed.	2	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship. Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015. We noted the ERA has not directed Horizon Power to review its hardship policy and hardship procedures during the audit period.</p> <p>Horizon Power's Hardship Policy and Procedures have been developed in consultation with relevant consumer representatives, namely the WACOSS and the FCAWA. It is the Senior Customer Service Officer's responsibility to</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>maintain and update both documents, with amendments requiring approval from the Retail Services Manager and the Manager Customer Service. Additionally, Horizon Power have a document reminder system 'CURA' which alert relevant Horizon Power employees via email when relevant policy or guidelines are due for review.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
226	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(7)	A retailer must comply with the ERA's Financial Hardship Policy Guidelines.	4	<p>Through enquiries with the Senior Customer Service Officer and examination of the Hardship Policy, we noted:</p> <ul style="list-style-type: none"> Horizon Power are aware of the requirement that they must comply with the ERA's Financial Hardship Policy Guidelines; Horizon Power last formally updated their Financial Hardship Policy in 2015 and this is publically available on the Horizon Power website; Horizon Power have developed internal Financial Hardship Procedures to ensure that work practices align to the ERA's Guidelines. We note that the ERA updated its hardship policy guidelines in August 2019, following which a review was conducted by Horizon Power to ensure alignment to the new guidelines. However, no changes to the internal Financial Hardship Procedures were deemed necessary post review; Horizon Power's Financial Hardship Policy and Procedures were developed in consultation with WACOSS and FCAWA; Horizon Power have a system called 'CURA' which alerts relevant Horizon Power employees via email when relevant policies or guidelines including the Financial Hardship Policy are due for review; and Horizon Power and Computershare staff are provided with adequate training to attend to customers facing financial hardship and payment difficulties <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
227	Electricity Industry Act, section 82	Code of Conduct, clause 6.10(8)	If a retailer makes a material amendment to its hardship policy, the retailer must consult with relevant consumer representatives and submit a copy of the retailer's amended hardship policy to the ERA within 5 business days of the amendment.	4	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have developed a hardship policy and procedures to assist customers experiencing financial hardship. Both the Policy and Procedures were last amended and submitted to the Authority for review in June 2015. We noted the ERA has not directed Horizon Power to review its hardship policy and hardship procedures and Horizon Power has not made a material amendment to its hardship policy during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
228	Electricity Industry Act, section 82	Code of Conduct, clause 6.11	A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	4	<p>Through enquiries with the Retail Services Manager, we noted in the event a business customer experiences payment difficulties, Horizon Power will assist the business customer into entering an alternative payment arrangement plan. The option to offer a payment arrangement plan to a business customer is considered on case by case basis by the Credit Management team, RCMs or the Retail Services Manager. The process to calculate and apply a payment arrangement plan is performed through Velocity via the same process that is used for residential customers. It was noted through enquiries with the Retail Services Manager, that Horizon Power offers business customers various alternative payment options, including extended payment arrangements and balloon payment arrangements. Business customers are not eligible to apply for a HUGS grant. Additionally, Horizon Power and Computershare staff are provided with adequate training to attend to customers facing financial hardship and payment difficulties.</p> <p>Based on an examination of Velocity screenshots relating to a business customer experiencing payment difficulties, we noted Horizon Power had entered a business customer into an alternative payment arrangement plan.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
229	Electricity Industry Act, section 82	Code of Conduct, clause 7.1(1)	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).	4	<p>Through enquiries with the Metering Services Manager and examination of Horizon Power's Velocity Credit Cycle, we noted Horizon Power have the following processes and timeframes in place to ensure they use their best endeavours to contact the customer to advise them of the proposed disconnection and to ensure the customer is disconnected within the obliged timeframes:</p> <ul style="list-style-type: none"> • Horizon Power will send an SMS reminder 14 business days after the invoice is sent to the customer. • Horizon Power's Policy is to not disconnect a customer unless the outstanding amount is greater than \$300. • A reminder notice is sent to the customer 16 business days after the invoice is sent to the customer, where the amount due is greater than \$50. The reminder notice advises customer to contact Horizon Power should they be experiencing payment difficulties. • A Disconnection Warning Notice is sent five business days after the Reminder Notice, being 21 business days after the invoice issue date. • The customer will receive a phone call five days after the Disconnection Warning Notice has been delivered, to inform the customer of their obligation to pay for the overdue account. • A Disconnection Warning Card service order is raised 30 business days after the invoice issue date, • Disconnection service orders take approximately five business days to be processed. <p>We noted this process is an automated process with reminder notices and disconnection warnings issued according to the timeframes above which are pre-programmed into Velocity.</p> <p>All amendments to letters, bills, notices and publicly available documents are reviewed by Retail Services and Legal team prior to release. Additionally, it was noted by the Retail Services Manager that in 2020, a Customer Experience Communication team was formed to develop customer written information.</p>	<p><u>Recommendation 5/2020:</u></p> <p>Horizon Power to include reference to the Electricity Ombudsman and contact number for the Electricity Ombudsman in the disconnection warning template.</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Review of Horizon Power's Reminder Notice Example notes the clear inclusion of an enquiries phone number, and outlines the actions a customer may take should they be experiencing payment difficulties.</p> <p>Review of a Disconnection Warning notes that Horizon Power provides at least five business days' notice to the customer, however it omits the complaints handling process including the contact number and option to access the Electricity Ombudsman.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
230	Electricity Industry Act, section 82	Code of Conduct, clause 7.2(1)	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).	4	<p>Through enquiries with the Metering Services Manager, we noted Horizon Power has policies and procedures in place to ensure that customers are not disconnected due to non-payment under the prescribed circumstances. Horizon Power's procedures ensure that:</p> <ul style="list-style-type: none"> A disconnection service order is raised 30 business days after the invoice issue date, and disconnection is not raised until at least 17 business days from the receipt of the disconnection warning notice Customers who agree to enter into a payment agreement have a manual suppression placed on their account within Velocity to inhibit disconnection Customers who are experiencing payment difficulties and have advised Horizon Power will have a manual suppression placed on their account within Velocity to inhibit disconnection Velocity does not allow two open accounts for the same NMI meter number, therefore a customer's account cannot be linked to an AMI meter that is not operational at their supply address and linked to another account. <p>Horizon Power's Policy is to not disconnect a customer unless the outstanding amount is greater than \$300.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
232	Electricity Industry Act, section 82	Code of Conduct, clause 7.4(1)	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.	4	<p>Through enquiries with the Metering Services manager, we noted Horizon Power uses its best endeavours to not disconnect a customer for denying access to a meter in accordance with the prescribed circumstances. Horizon Power's Metering team generate a report in Qlikview which outlines the meters that have not been read for 10 months. If a customer has not had a meter reading for 9-10 months, Metering services will raise a Must Read Service Order for the reads to be obtained to ensure that Horizon Power have taken 1 actual reading in a 12 month time frame. If a customer denies entry to the site, Horizon Power (local offices) will request the customer to send a photo of the meter in full to allow Horizon Power to issue a an actual read based bill. Currently, all bar 19 Horizon power meters can be read remotely. For those on the old meters, field technicians attend the premises every 10 months to obtain a meter reading. This may be further enhanced by Horizon Power continuing to work with the customers who remain on the old meters to migrate to the new AMI meters.</p> <p>Discussions with the Retails Services Manager noted that during the audit period, Horizon Power had not disconnected a customer for denying access to the meter.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	B	1
233	Electricity Industry Act, section 82	Code of Conduct, clause 7.5	A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24-hour emergency line and use its best endeavours to restore supply as soon as possible.	4	<p>Through enquiries with the Metering Services Manager and examination of Horizon Power's Standard Bill Template, Customer Charter and website, we noted Horizon Power has a 24-hour emergency hotline available to customers to obtain information on the status of an emergency outage and will use its best endeavours to restore supply to the affected customer as soon as it is deemed safe and as soon as possible. We noted all amendments to letters, bills, and publicly available documents are reviewed by Retail Services and Legal team prior to release. Additionally, it was noted by the Retail Services Manager that in 2020, a Customer Experience Communication team was formed to develop customer written information. All customer's bills are</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>automatically generated through Velocity using a standard bill template.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
234	Electricity Industry Act, section 82	Code of Conduct, clause 7.6	Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in subclauses 7.6(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.	2	<p>Through enquiries with the Senior Customer Service Officer, we noted if a complaint is made to Horizon Power or the Ombudsman, the CSR will apply a temporary complaint suppression to the customer's Velocity account. Suppression of a customer's account will halt any overdue notifications and will stop an account from being disconnected. We noted this temporary suppression applied is for a period of 28 days and CSRs will add a manual calendar reminder prior to the 28 business days to check the status of the complaint and decide whether an extension of the suppression is needed. Once a complaint has been resolved, the CSR will close the complaint in Velocity releasing the account from suppression.</p> <p>Sample testing of five customer complaints verified that customer's accounts were correctly suppressed where a complaint was made directly related to the reason for a proposed disconnection to Horizon Power, Ombudsman or an external dispute resolution body.</p> <p>It was noted through enquiries with the Metering Services Manager that disconnection service orders for AMI meters are raised in Velocity and sent to the metering data system, 'MDR Control' for action. It was confirmed that business rules are embedded in the 'MDR Control' system to disallow service orders to be processed:</p> <ul style="list-style-type: none"> • After 3.00 pm Monday to Thursday; or • After 12.00 noon on a Friday • On a Saturday, Sunday, public holiday or on the business day before a public holiday <p>Service orders which are raised in Velocity during the above times are sent to 'MDR Control' and placed in a queue to be actioned on the next available day.</p> <p>For non-AMI meters, service orders are processed immediately for the Regional Office to action involving a manual disconnection of electricity at a customer's supply address. It was noted in the 2017/18 Horizon Power Annual Compliance Report that two instances were identified where a customer was manually disconnected after 3pm for non-payment and another customer</p>	<p>No further action given resolution during the audit period.</p> <p>Horizon Power have put in place process rules to ensure manual service orders explicitly include reference to de-energisation timeframes as well as further training rolled out to all teams involved in the de-energisation process.</p>	B	3

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>manually disconnected the day before a public holiday. This breach was also raised in the ERA Type 1 Licence Contravention Notice. Both instances were in relation to non-AMI meters. To prevent further reoccurrence of this breach, Horizon Power have put in place process rules to ensure manual service orders explicitly include reference to de-energisation timeframes as well as further training rolled out to all teams involved in the de-energisation process.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a moderate impact on customers or third parties.</p>			
235	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(1)	<p>If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must comply with subclause 7.7(1).⁹</p> <p>Footnote: ⁹ Note: The Code of Conduct no longer requires retailers to register the life support equipment of the customer.</p>	2	<p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request, usually via customer directly calling the Computershare call centre. A life support equipment form is then sent out to the customer to obtain confirmation from an appropriately qualified medical practitioner of the life support requirement via registered post. At the same time, the customer account is assigned a life support critical code which triggers a remote lockout function to be applied on the meter in SSN-UIQ at move in or when notified by the customer subsequent to their move in. The remote lockout prevents the meter from being de-energised in all circumstances. Additionally, prior to any disconnection service order being raised, a Senior Customer Officer will check the customer details ledger on Velocity to ensure that it is not for a Life Support customer and once this is approved, the credit team are then permitted to raise the disconnection service order.</p> <p>The Retail Services Manager advised that if the process were initiated by a customer providing Horizon Power with confirmation from an appropriately qualified medical practitioner regarding the requirement of life support equipment, the receipt of this confirmation will be recorded against customer account on Velocity and the same registration procedures as detailed above would be followed. However, as confirmed by the Retail Services</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Manager, during the audit period, there were no instance of customer providing Horizon Power with confirmation from an appropriately qualified medical practitioner regarding the requirement of life support equipment.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
236	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(2)	<p>A retailer must undertake the actions specified in subclauses 7.7(2) (e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer:</p> <ul style="list-style-type: none"> - that the person requiring life support equipment is changing supply address; - that the customer, but not the person requiring life support equipment, is changing supply address; - of a change in contact details; or - that the address no longer requires registration as life support equipment address. 	2	<p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the required changes on the customer life support details on Velocity upon receiving the customer request. Any changes made to life support customer details will create a workflow on Velocity to be approved by the Retail Services Manager. A daily automated SQL report for life support customer is sent out from Velocity to the RCMs in the regions for review.</p> <p>Sample based testing of five life support customers during the audit period noted that where requests were received directly from customers via calls regarding changes required to their accounts, a memo was created on Velocity to record these change requests, and changes were registered on Velocity within the required timeframe.</p> <p>In addition, as Horizon Power is a vertically integrated utility, the requirement of Clause 7.7(2)(f) under the Code of Conduct requiring the retailer to notify the distributor would not be applicable to Horizon Power.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
237	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(3)	The distributor must comply with subclauses 7.7(3) (a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1) (c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).	2	<p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type or any required changes to the customer life support details on Velocity upon receiving the customer request. Any changes made to life support customer details will create a workflow on Velocity to be approved by the Retail Services Manager. A daily automated SQL report for life support customer is</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>sent out from Velocity to the RCMs in the regions for review.</p> <p>As Horizon Power is a vertically integrated utility, the requirement of Clause 7.7(1)(c) and 7.7(3)(a) under the Code of Conduct requiring the distributor to act on the request of a retailer would not be applicable to Horizon Power, given there is currently no other retailer on its supply network. We also confirmed with the Retail Services Manager that, during the audit period, Horizon Power had not received any instruction from a relevant government agency regarding the requirement to add or change life support customer details.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
238	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(4)	If life support equipment is registered at a customers' supply address under subclause 7.7(3) (a), a distributor must comply with subclauses 7.7(4) (a) and (b).	2	<p>Through enquiries with the RCMs Port Hedland and Kununurra and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code which triggers a remote lockout function to be applied on the meter in SSN- UIQ at move in or when notified by the customer subsequent to their move in. The remote lockout prevents the meter from being de-energised in all circumstances.</p> <p>Additionally, prior to any disconnection service order being raised, a Senior Customer Officer will check the customer details ledger on Velocity to ensure that it is not for a Life Support customer and once this is approved, the Credit Team are then permitted to raise the disconnection service order. A daily automated SQL report for life support customer is sent out from Velocity to the RCMs for review. If required, the RCMs will update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events as per the Emergency Procedure – Severe Storm, Cyclone, Flood and Bushfire Response. The updated localised report is distributed by the Customer Service Officer in the region via email to the regional staffs and on-site crews. Where there are planned outages, a report is generated through the OCS by the Operations team by inputting the transformer number which will be</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>affected by the outage. The system will then then provide all installation details that will be affected and, including any life support critical codes attached to the supply address. The Customer Services Officers in the regions refer to this report and their localised report to make contact with each customer affected on the list, via phone calls or text message. At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer. All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible by the regions.</p> <p>Matching of five customer accounts against disconnection listing during the audit period noted that these customers had not been disconnected due to non-payment throughout the audit period when life support was required. We have also confirmed with the RCMs from both Port Hedland and Kununurra regions that, during the audit period, there had only been one instance where a life support customer had been affected by a planned outage in the Port Hedland region. Based on a walkthrough performed, we noted a paper notification was hand delivered to the customer property by the Power Worker a week prior to the planned outage taking place. An email confirmation was provided by the Power Worker confirming that customer had acknowledged receipt of the notification. Additionally, we sighted the report generated from OCS for the planned outage on that date and noted it was updated to include contact made to the affected customers via email or text.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
238A	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(4A)	A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is registered as a life support equipment address.	3	Through enquiries with the RCMs and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity. A daily automated SQL report for life support	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>customer is sent from Velocity to the RCMs for review. If required, the RCMs will update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events as per the Emergency Procedure – Severe Storm, Cyclone, Flood and Bushfire Response. The updated localised report is distributed by the Customer Service Officer in the region via email to the regional staffs and on-site crews. Where there are planned outages, a report is generated through the OCS by the Operations team by inputting the transformer number which will be affected by the outage. The system will then provide all installation details that will be affected and, including any life support critical codes attached to the supply address. The Customer Services Officers in the regions refer to this report and their localised report to make contact with each customer affected on the list, via phone calls or text message. At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer. All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible by the regions.</p> <p>The RCMs advised that if there were any planned outage to restore supply, the same notification processes would be followed.</p> <p>A recommendation was raised in the 2017 Performance Audit Report in relation to Obligation 238A for management to update work instructions to capture detailed system notes for contacts made to a life support customer and/ or their caregiver to inform of a planned outage. This was resolved by management during the audit period as we noted the RCMs performed daily checking of the SQL report for any changes to the life support customer details as well as maintaining evidence of contact logs for each planned outage.</p> <p>We have confirmed with the RCMs from both Port Hedland and Kununurra regions that, during the audit period, Horizon Power is the only supplier of power within both regions. Horizon Power is not aware of any instance where a life support equipment address had been affected by an interruption to restore supply. Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.			
239	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(5)	If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption.	3	<p>Through enquiries with the RCMs Port Hedland and Kununurra and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request and the customer account is assigned a life support critical code on Velocity. A daily automated SQL report for life support customer is sent from Velocity to the RCMs for review. If required, the RCMs will update their localised report if there is a change as part of the prevention and preparedness for unplanned outages or weather events as per the Emergency Procedure – Severe Storm, Cyclone, Flood and Bushfire Response. The updated localised report is distributed by the Customer Service Officer in the region via email to the regional staffs and on-site crews. Where there are planned outages, a report is generated through the OCS by the Operations team by inputting the transformer number which will be affected by the outage. The system will then then provide all installation details that will be affected and, including any life support critical codes attached to the supply address. The Customer Services Officers in the regions refer to this report and their localised report to make contact with each customer affected on the list, via phone calls or text message. At least three business days prior to any planned outages, on-site crews will perform door knock at each property that will be impacted and hand deliver paper notification of planned outages, using a copy of the localised report as reference. The crews will advise the regional office when they have successfully notified the customer. All correspondence to relevant customers is saved under a Planned Power Outages inbox accessible by the regions.</p> <p>The RCMs advised that the daily automated SQL report identifies any new life support customers who are added. On a daily basis, the crews check this list against any planned outage affecting the supply addresses and ensure that a further notification is provided to the life support customers as appropriate.</p> <p>A recommendation was raised in the 2017 Performance Audit Report in relation to Obligation 239 for management to update work instructions to capture detailed system</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>notes for contacts made to a life support customer and/ or their caregiver to inform of a planned outage. This was resolved by management during the audit period as we noted the RCMs performed daily checking of the SQL report for any changes to the life support customer details as well as maintaining evidence of contact logs for each planned outage.</p> <p>We have confirmed with the RCMs from both Port Hedland and Kununurra regions that, during the audit period, Horizon Power is the only supplier of power within both regions. Horizon Power is not aware of any instance where a planned interruption had affected a life support customer prior to registering the customer's supply address as a life support equipment address.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
240	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(6)	A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).	4	<p>Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence 3 months prior to due dates to ensure enough time is provided for customer to turnaround responses.</p> <p>Review of the Life Support Customers Mailout Log 2017-2018 noted that the annual renewal and 3 year re-certification forms were last sent out to 17 life support customers within the Port Hedland and Kununurra regions between July 2017 and April 2018. Based on the existing life support customer data listing provided by Horizon Power, there were 48 existing life support customers within both Port Hedland and Kununurra regions as at the end of the audit period. It is noted that:</p> <ul style="list-style-type: none"> Horizon Power had not requested annual confirmation from the 17 life support customers, during the audit period, since the last annual renewal and 3 year re-certification forms were sent out in 2017/18. 	<p>Recommendation 6/2020:</p> <p>Horizon Power should examine the current life support customer listing to ensure that:</p> <p>(i) all initial certification forms have been sent out to life support customers and returned with sign off by an appropriately qualified medical practitioner confirming life support requirement;</p> <p>(ii) annual confirmations with life support customers regarding the requirement of life support equipment (where applicable) are</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Horizon Power had not requested annual confirmation and 3 year re-certification from the remaining life support customers in both Port Hedland and Kununurra regions during the audit period. <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>	<p>appropriately logged on Velocity; and</p> <p>(iii) 3 year re-certification forms have been sent out to life support customers (where applicable) and returned with sign off by an appropriately qualified medical practitioner confirming life support requirement.</p> <p>Additional control should also be implemented for a periodic review over the conduct of these confirmation processes to ensure compliance of the obligation.</p> <p>In line with good practice, the returned forms should be retained electronically under the respective customer accounts for record keeping purposes.</p>		
241	Electricity Industry Act, section 82	Code of Conduct, clause 7.7(7)	A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).	3	Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Customer – C9.8 Life Support Customers – 12 month and 3 year re-certification process flowchart, we noted the RCMs for each region is responsible to request re-certification of the life support equipment. The RCMs receive system reminder to send out the renewal form based on the memo added to the customer account upon move in. The checks usually commence three months prior to due dates to ensure enough time is provided for customer to turnaround responses. As stipulated within the procedural documents, life support flag will not be removed from the customer supply address if the	<p><u>Recommendation 7/2020:</u></p> <p>Horizon Power should update the current life support customer register to ensure that life support customers are removed upon satisfaction of subclause 7.7(7)(a)(i), (ii) or (iii) of the Code of Conduct.</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>customer fails to return an annual confirmation. However, life support flag can be removed from the supply address if customer fails to return the 3-year re-certification after the third reminder had been issued by telephone, fax, in person, mail or email. Each reminder have to be sent 20 business days apart. Removal of the life support flag for a customer is by way of putting an end date to the life support requirement on Velocity against the supply address, to advice the system that the condition is no longer active. Any changes to life support customer details will create a workflow on Velocity to be approved by the Retail Services Manager and changes will be included in the daily automated life support report sent out to the regions for review. Based on the daily automated SSN and mdata21 update true up report from MDR run at 3pm, metering will then update each site and remove the remote lock-out.</p> <p>Based on a walkthrough performed on a life support customer from the Kununurra region, we noted the customer had not returned an initial confirmation from an appropriately qualified medical practitioner regarding the life support requirement and had not been sent or returned an annual confirmation of the life support requirement during the audit period. However, we noted the customer details had not been removed from the life support register for failure to return a confirmation. Horizon Power has self-reported non-compliance against Obligation 241 in the 2017/18 and 2018/19 Annual Compliance Report and has taken a stand to not remove customer from the life support register without appropriate notification that the customer is no longer on life support requirement to mitigate the risk of harm to customers.</p> <p>We noted training in relation to the life support management processes was rolled out to the RCMs for all regions in February 2020 which will help to tighten the process around the conduct of confirmation request for life support requirement within the required timeframe.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
242	Electricity Industry Act, section 82	Code of Conduct, clause 8.1(1)	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.	2	<p>Through enquiries with the Retail Services Manager, and Metering Services Manager, supplemented by walkthrough of Velocity, we noted Horizon Power has policies and procedures in place that;</p> <ul style="list-style-type: none"> If a customer is disconnected due to non-payment, and subsequently requests a reconnection and provides proof of payment that any outstanding balance has been paid or agrees to a payment plan or is assessed as experiencing payment difficulties or financial hardship, Horizon Power will reconnect the supply address. If a customer is disconnect for non-application, Horizon Power will reconnect the customer when an account is established with Horizon Power and the occupant of the supply address becomes a customer of Horizon Power. <p>When a customer contacts Horizon Power and requests a reconnection after a disconnection due to non-payment, Horizon Power CSRs will seek that the customer provides Proof of Payment, or enters into a payment plan. Once proof of payment (whether in full or as an instalment of a payment plan) is received, the CSR will raise a re-energisation service order which is processed overnight via the AMI meters.</p> <p>Sample based testing of five customers during the audit period noted that Horizon Power reconnected a customer's supply address within timeframes stipulated under clause 8.2(2) of the Code after the customer remedied their breach.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
244	Electricity Industry Act, section 82	Code of Conduct, clause 8.2	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 8.2(2).	4	<p>Through enquiries with the Retail Services Manager, we noted the reconnection timeframe for Horizon Power is within timeframes stipulated under clause 8.2(2) of the Code.</p> <p>For AMI meters, the automated reconnection process takes approximately ten minutes once the reconnection service is raised through Velocity and mData21. The customer is then instructed to push a button on the meter to reconnect the premise. An mData21 automated report</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>is generated and monitored three times daily to ensure reconnections are performed in a timely manner. For non-advanced meters, a service order is processed immediately for the Regional Office to action within the required timeframes stipulated under clause 8.2(2). A daily Qlikview report is extracted from the system by the Senior Meter Data Officer to monitor reconnections taking greater than one business day.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
245	Electricity Industry Act, section 82	Code of Conduct, clause 9.1(2)	A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice published in the Government Gazette.	4	<p>Through enquiries with the Retail Services Manager and review of relevant documentation, we noted the Horizon Power licence area is an area in which a distributor may operate a pre-payment meter and a retailer may offer a pre-payment meter service as declared by the Minister by notice published in the Government Gazette.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
246	Electricity Industry Act, section 82	Code of Conduct, clause 9.2(1)	A retailer must not provide a pre-payment meter service at a residential customer's supply address without the verifiable consent of the customer or the customer's nominated representative.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted pre-payment meters are only offered to communities individually gazetted by the Minister for Energy. Customers can apply for a pre-payment meter by contacting Horizon Power, where a member of the pre-payment metering administration team will seek verbal confirmation over the phone that the customer wishes to enter into a pre-payment meter plan. Calls are not recorded, however notes are a mandatory section in the move-in-wizard. These notes include:</p> <ul style="list-style-type: none"> • Time the customer rang; • Supply address customer is moving into; • Confirmation that all tariffs and concession have been explained; • Confirmation that no life support is at the premises; and • A welcome pack has been posted to the customer. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
247	Electricity Industry Act, section 82	Code of Conduct, clause 9.2(2)	A retailer must establish an account for each pre-payment meter operating at a residential customer's supply address.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has processes and procedures to ensure that an account is established for each pre-payment meter operating at a supply address. Horizon Power's move-in-wizard is built in to Velocity when creating accounts as a mandatory process, to ensure all customers details are confirmed, and verifiable consent received. A new account must be created in Velocity to ensure the move in wizard is prompted.</p> <p>Review of Horizon Power's move-in-wizard within Velocity noted that a new account is created when a customer calls and requests a new pre-payment meter to be established.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
249	Electricity Industry Act, section 82	Code of Conduct, clause 9.3(1)	If a residential customer requests information on the use of a pre-payment meter, a retailer must advise the information specified in subclause 9.3(1) at no charge, and in clear, simple and concise language.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted when a customer requests information on energy consumption, Horizon Power will endeavour to provide a usage breakdown at no charge. Pre-payment information is mailed out on the day when a customer establishes their account.</p> <p>Inspection of the pre-payment meter information pack mailed out to customers noted that it included all the required particulars outlined in 9.3(1) in clear, simple and concise language.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
250	Electricity Industry Act, section 82	Code of Conduct, clause 9.3(2)	No later than 10 business days after the time a residential customer enters into a pre-payment meter contract at that customer's supply address, a retailer must give, or make available to, that customer the information specified in subclauses 9.3(1) and 9.3(2)(a)-(s) at no charge.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted when a customer requests information on energy consumption, Horizon Power will endeavour to provide a usage breakdown at no charge. Pre-payment information is mailed out on the day when a customer establishes their account.</p> <p>Inspection of the pre-payment meter information pack mailed out to customers noted that it included all the required particulars outlined in 9.3(1) in clear, simple and</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					concise language. The information pack is posted to the customer within 10 business days and at no charge. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
251	Electricity Industry Act, section 82	Code of Conduct, clause 9.3(3)	A retailer must ensure that the following information is shown on, or directly adjacent to, a residential customer's pre-payment meter: - the positive or negative financial balance of the pre-payment meter within one dollar (\$1) of the actual balance; - whether the pre-payment meter is operating on normal credit or emergency credit; - A telephone number for enquiries; and - the distributor's 24-hour telephone number for faults and emergencies.	4	Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has processes in place to ensure all pre-payment meters installed have the necessary information shown directly adjacent to the residential customer's pre-payment meter. As all pre-payment meters are AMI meters, the AMI meters are designed to include the necessary information. Examination of the AMI Meter Information, noted that the information outlined in subclause 9.3(3) is shown on or directly adjacent to the meter. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
252	Electricity Industry Act, section 82	Code of Conduct, clause 9.3(4)	On request and at no charge, a retailer must give a pre-payment meter customer the following information: total energy consumption; average daily consumption; and the average daily cost of consumption for the previous 2 years, or since the commencement of the pre-payment meter contract (whichever is shorter), divided into quarterly segments.	4	Through enquiries with the Pre-payment Metering Administrator and review of key documents, we noted when a pre-payment customer requests information on energy consumption, Horizon Power representatives endeavour to provide usage breakdown at no charge. Horizon Power customer also have the ability to access energy consumption data and usage breakdown on the Horizon Power App at no charge. Through enquiries with the Retail Services Manager we noted Horizon Power did not receive any requests to provide data for total energy consumption, average daily consumption, or average daily cost of consumption during the audit period. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.	N/A	A	NR
253	Electricity Industry Act, section 82	Code of Conduct, clause 9.3(5)	If the recharge facilities available to a residential customer change from the initial recharge facilities referred to in subclause (2)(r), a retailer must use	4	Through enquiries with the Pre-payment Metering Administrator, it was determined Horizon Power has processes in place to ensure customers are notified in the required timeframe should there be a change to the	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			reasonable endeavours to notify a pre-payment meter customer in writing or by electronic means within 10 business days of the change.		<p>recharge facilities offered. All current recharge facilities can be found within pre-payment information packs that are issued to customers upon account establishment. Should there be a change to a recharge facility, Horizon Power will mail or text a customer affected within ten business days of being made aware of the change.</p> <p>Through enquiries with the Retail Services Manager we noted during the audit period, Horizon Power included the ability to recharge pre-payment meter services via the Horizon Power App. Discussions with the Retail Services Manager noted that Horizon Power visited pre-payment communities in person to provide demonstrations on the Horizon Power App and provide brochures outlining the new recharge facility.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
254	Electricity Industry Act, section 82	Code of Conduct, clause 9.4(1)	<p>If a pre-payment meter customer notifies a retailer that it wants to replace or switch a pre-payment meter to a standard meter, the retailer must</p> <ul style="list-style-type: none"> - send the information referred to in clauses 2.3 and 2.4 to the customer; and - arrange with the relevant distributor to remove or render non-operational the pre-payment meter and replace or switch the pre-payment meter to a standard meter within 1 business day of the request. 	4	<p>Through enquiries with the Pre-payment Metering Administrator and Retail Services Manager, we noted Horizon Power's AMI meters have the ability to switch between pre-payment functionality and a standard functionality. Once a customer switches or replaces a pre-payment meter to a standard meter, a new account is created on Velocity, and the system automates an instruction to Computershare to post out a welcome letter. The Horizon Power Welcome Letter is a standard letter that outlines that particulars in clause 9.4(1)(a) regardless of the tariff applicable to the customer.</p> <p>Review of a welcome letter to a pre-payment customer outlined all the particulars within clause 9.4(1)(a), and review of a Velocity log for pre-payment to standard meter switch noted that Horizon Power transferred the customer from a pre-payment account to a credit account within one business day of the request.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
255	Electricity Industry Act, section 82	Code of Conduct, clause 9.4(2)	A retailer must not charge for reversion to a standard meter if a pre-payment customer is a residential customer and that customer, or their nominated representative, requests	4	Through enquiries with the Pre-payment Metering Administrator and the Retail Services Manager, supplemented by a review of Horizon Power's policy in relation to charges for revision to a standard meter from a pre-payment meter, we noted Horizon Power does not	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			reversion of a pre-payment meter within 3 months of its installation or the date the customer agreed to enter into the pre-payment contract, whichever is later.		charge a fee for switching between a pre-payment meter and standard meter, as the AMI meters are used for both instances and switching can be done remotely. Examination of Horizon Power Electricity Tariffs and Charges Brochure noted that there was no fee outlined for switch from a pre-payment meter to a standard meter. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
256	Electricity Industry Act, section 82	Code of Conduct, clause 9.4(4)	If a retailer requests the distributor to revert a pre-payment meter, a distributor must do so within 5 business days of receipt of the request for supply addresses within the metropolitan region, and within 10 business days for supply addresses within regional areas.	4	Through enquiries with the Pre-payment Metering Administrator and the Retail Services Manager, supplemented by a review of Horizon Power's policy in relation to revision to a standard meter from a pre-payment meter, we noted the AMI meters are used for both instances and therefore switching can be done remotely and instantly upon request being made to Horizon Power. Review of a Velocity log for pre-payment to standard meter switch noted that Horizon Power transferred the customer from a pre-payment account to a credit account within one business day of the request. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
257	Electricity Industry Act, section 82	Code of Conduct, clause 9.5(1)	If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the supply address requires life support equipment, a retailer must not provide a pre-payment meter service in that address. or, if applicable, comply with the prescribed requirements in subclauses 9.5(1)(a)-(c).	2	Through enquiries with the Retail Services Manager and review of the Work Instruction – Life Support Processes as well as the Life Support Process Flows, we noted Horizon Power records the customer life support registration and equipment type on Velocity upon receiving the customer request, usually via customer directly calling the Computershare call centre. A life support equipment form is then sent out to the customer to obtain confirmation from an appropriately qualified medical practitioner of the life support requirement via registered post. At the same time, the customer account is assigned a life support critical code and restrict account to a standard meter. This automatically converts any existing pre-payment meter on the supply address to a standard meter, at no charge. This also triggers a remote lockout function to be applied on the meter in SSN-UIQ at move in or when notified by the customer subsequent to	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>their move in. The remote lockout prevents the meter from being de-energised in all circumstances.</p> <p>A recommendation was raised in the 2017 Performance Audit Report in relation to Obligation 257 for management to update the question flow within Velocity to include a question on whether the customer inquiring about a pre-payment meter service may also require life support. This was resolved by management during the audit period as we noted the move in wizard on Velocity has included prompt for the Pre-payment Metering Administrator to check with the customer if they require life support at the supply address.</p> <p>We have confirmed with the Retail Services Manager that, during the audit period, there were no instance of customer providing Horizon Power with confirmation from an appropriately qualified medical practitioner regarding the requirement of life support equipment.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
258	Electricity Industry Act, section 82	Code of Conduct, clause 9.5(2)	If a retailer requests a distributor to revert a pre-payment meter under subclause 9.5(1), the distributor must revert the pre-payment meter within the time frames specified in subclause 9.5(2) (a)-(b).	2	<p>Through enquiries with the Pre-payment Metering Administrator and the Retail Services Manager, supplemented by a review of Horizon Power's policy in relation to revision to a standard meter from a pre-payment meter, we noted the AMI meters are used for both instances and therefore switching can be done remotely and instantly upon request being made to Horizon Power.</p> <p>We confirmed with the Pre-payment Metering Administrator that during the audit period, Horizon Power had not received any request made by a customer flagged as requiring life support to revert a pre-payment meter.</p> <p>Based on enquiries, examination of documentation and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
259	Electricity Industry Act, section 82	Code of Conduct, clause 9.6	A retailer must ensure that a pre-payment meter service complies with the prescribed requirements in subclause 9.6.	4	Through enquiries with the Pre-Payment Metering Administrator, we noted Horizon Power has policies and procedures in place to ensure that pre-payment meter	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>services comply with the following particulars outlined in clause 9.6:</p> <ul style="list-style-type: none"> Horizon Power's AMI meters are programmed to have \$20 emergency credit outside normal business hours; Through the use of AMI meters, Horizon Power can accurately monitor energy data usage as AMI meters upload usage data to mData21 at six hourly intervals; and AMI meters are capable of providing connection and disconnection data to mData21, as well as reconnecting supply once payment to the account in Velocity has been received. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
260	Electricity Industry Act, section 82	Code of Conduct, clause 9.7(a), (b) and (d)	<p>A retailer must ensure that:</p> <ul style="list-style-type: none"> - at least 1 recharge facility is located as close as practicable to a pre-payment meter, and in any case no further than 40 kilometres away; - a pre-payment meter customer can access a recharge facility at least 3 hours per day, 5 days a week; and - the minimum amount to be credited by a recharge facility does not exceed \$20 per increment. 	4	<p>Through enquiries with the Pre-payment Metering Administrator and Retail Services Manager, we noted Horizon Power only offer pre-payment meter, on request, in the remote aboriginal communities. Horizon Power ensures that there is a recharge operator either in the community itself or at a supermarket or post office located nearby to the pre-payment community in accordance with the requirement of clause 9.7(a) and (b) of the Code. The minimum recharge amount of \$10 has been built into the prepayment SGCS system thus not exceeding \$20 per increment. In addition, Horizon Power also makes available, recharge facilities via the Horizon Power App.</p> <p>Review of the Recharge Operator Contact List and Operating Hours noted that there is at least 1 recharge facility located for each remote aboriginal community with operating hours in line with the requirement of the Code. Examination of the SGCS system noted that the recharge amount has been set at \$10.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
261	Electricity Industry Act, section 82	Code of Conduct, clause 9.8	If a pre-payment meter customer demonstrates to a retailer that the customer is entitled to receive a	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has policies and procedures in place to ensure that if a customer</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			concession, the retailer must ensure that the pre-payment meter customer receives the benefit of the concession.		<p>demonstrates they are entitled to a concession, Horizon Power will apply the concession to the customer's account. During the account establishment process, the Pre-payment Metering Administrator is prompted to request a CRN as part of the move-in-wizard, and concession details are entered at the time an account is set up. Rebates are issued after a meter reading route has been read and the read data has been posted back to Velocity. Velocity then issues an "invoice" and once the invoice has been issued, the funds are transferred into SGCIS the next morning.</p> <p>Review of an example of a customer entering into a pre-payment metering contract, it was confirmed that Horizon Power notes customers CRN at the time an account is established.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
262	Electricity Industry Act, section 82	Code of Conduct, clause 9.9(1)	If requested by a pre-payment meter customer, a retailer must make immediate arrangements to check the metering data; test the pre-payment meter; and/or arrange for a test of the metering installation at the connection point.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has policies and procedures in place for when a customer requests a pre-payment meter test from Horizon Power, a Horizon Power representative will raise a service order immediately to arrange a pre-payment meter test, as well as arranging to check the customer's meter data as outlined in the Meter Test Process Map.</p> <p>Through Enquiries with the Retail Services Manager we noted during the audit period, there were no requests for a pre-payment meter test.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
263	Electricity Industry Act, section 82	Code of Conduct, clause 9.9(2)	If requested by a retailer, a distributor must check or test a pre- payment meter.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has policies and procedures in place for when a customer requests a pre-payment meter test from Horizon Power, a Horizon Power representative will raise a service order immediately to arrange a pre-payment meter test, as well as arranging to check the customer's meter data as outlined in the Meter Test Process Map.</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Through enquiries held with the Retail Services Manager, we note during the audit period, there were no requests for a pre-payment meter test.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
264	Electricity Industry Act, section 82	Code of Conduct, clause 9.9(4)	If a pre-payment meter is found to be inaccurate or not operating correctly, a retailer must: immediately arrange for the repair or replacement of the pre-payment meter; correct any overcharging or undercharging; and refund any charges payable by a customer for testing the pre-payment meter.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted Horizon Power has policies and procedures in place, should a pre-payment meter fail a meter test. Review of the Meter Test Process Map outlines that should a meter be deemed unsafe it should be tagged and a test report produced. Subsequently, usage will be calculated on accuracy difference and replacement interval data created to complete the meter test.</p> <p>Through enquiries with the Retail Services Manager, we noted during the audit period there were no requests for a pre-payment meter test.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated</p>	N/A	A	NR
265	Electricity Industry Act, section 82	Code of Conduct, clause 9.10(1)	Subject to a pre-payment meter customer notifying a retailer of the proposed vacation date, the retailer must ensure that the pre-payment customer can retrieve all remaining credit at the time that customer vacates the supply address.	4	<p>Through enquiries with the Pre-payment Metering Administrator, we noted when a customer notifies Horizon Power of a proposed vacation date, Horizon Power will ensure the customer can retrieve all remaining credit. Horizon Power AMI meters can be disconnected by Horizon Power representatives on the date the customer advises they will be vacating the supply address. The AMI meters will provide a usage data read and finalise the account within Velocity. When a Horizon Power representative is advised of the proposed vacation, if there is any credit remaining on the account they will raise a refund within Velocity and coordinate a refund either via cheque or EFT.</p> <p>Review of a Pre-payment Meter Finalisation Report noted that when the pre-payment customer advised they were vacating the supply address, the credit remaining on the</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>account was refunded by Horizon Power in accordance with the customers instructions.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
266	Electricity Industry Act, section 82	Code of Conduct, clause 9.10(2)	If a pre-payment meter customer (including a customer who has vacated the supply address) has been overcharged as a result of an act or omission of a retailer or distributor, the retailer must use its best endeavours to inform and reimburse the pre-payment meter customer, (except in the circumstances in clause 9.10(7)) in the timeframe and manner specified.	5	<p>Through enquiries with the Pre-Payment metering administrator, we noted customers can only be overcharged if a meter fails in the network operator's favour and that this has not occurred during the audit period. Review of the Meter Test Process Map outlines that should a meter fail, a test usage will be calculated on accuracy difference. If an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account within the specified timeframe.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated</p>	N/A	A	NR
267	Electricity Industry Act, section 82	Code of Conduct, clause 9.10(3)	The retailer must pay the amount in accordance with the pre- payment meter customer's instructions within 12 business days of receiving the instructions.	4	<p>Through enquiries with the Pre-Payment metering administrator, we noted customers can only be overcharged if a meter fails in the network operator's favour and that this has not occurred during the audit period. Review of the Meter Test Process Map outlines that should a meter fail, a test usage will be calculated on accuracy difference. If an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account within the twelve business day requirement of the Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
268	Electricity Industry Act, section 82	Code of Conduct, clause 9.10(4)	If a retailer does not receive reimbursement instructions within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount	5	Through enquiries with the Pre-Payment metering administrator, we noted customers can only be overcharged if a meter fails in the network operator's favour and that this has not occurred during the audit period. Review of the Meter Test Process Map outlines	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			overcharged to the customer's account.		that should a meter fail, a test usage will be calculated on accuracy difference. If an account is overcharged, Horizon Power will endeavour to obtain refund details via phone call, email or text. Should no correspondence be received, the amount will be credited to the customer's account. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.			
269	Electricity Industry Act, section 82	Code of Conduct, clause 9.10(6)	If a retailer proposes to recover an amount undercharged to a pre-payment meter customer as a result of an act or omission by the retailer or distributor, the retailer must comply with the conditions specified in subclause 9.10(6).	4	Through enquiries with the Pre-payment Metering Administrator, it was determined that Horizon Power did not attempt to recover an undercharged amount during the audit period. If a customer vacates a premises in emergency credit, Horizon Power will wear this cost. Based on enquiries held with the Pre-Payment Metering Administrator, it was concluded that Horizon Power had not attempted to recover any undercharged amount during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
270	Electricity Industry Act, section 82	Code of Conduct, clause 9.11(1)	A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative for a waiver of any fee to replace or switch a pre-payment meter to a standard meter.	4	Based on enquiries held with the Pre-payment Services Administrator, it was concluded that Horizon Power had not charged a fee to replace or switch a pre-payment meter to a standard meter during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
271	Electricity Industry Act, section 82	Code of Conduct, clauses 9.11(2)	If a retailer is informed by a pre-payment meter customer that the customer is experiencing payment difficulties or financial hardship, or the retailer identifies the customer as having been disconnected in the manner specified in subclause 9.11(2) (b), the retailer must, subject to subclause 9.11(3), use its best endeavours to contact the customer as soon as reasonably practicable to provide the information prescribed in subclause 9.11(2) (d)-(g).	5	Through enquiries with the Pre-payment Metering Administrator and Retail Services Manager, we noted if Horizon Power identifies a customer/or is to be informed that a pre-payment meter customer is in financial hardship, then the standard financial hardship procedures would apply, however the customer would not be eligible for the Hardship Utilities Grant Scheme. Inspection of Financial Hardship Work Instructions and Financial Hardship Policy noted that Horizon Power has processes and policies in place to refer customers experiencing payment difficulties or financial hardship to the relevant financial assistances programs, consumer representatives and counselling services, as well as offering information about different types of meters available to them. We confirmed with the Retail Services Manager that a pre-payment meter customer had not	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>informed Horizon Power of financial hardship or payment difficulties during the audit period. Additionally, Horizon Power had not identified any customers as being disconnected in the manner specified in 9.11(2) (b) during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
272	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(1)	A retailer must give notice of any variations in its tariffs, fees and charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.	4	<p>Discussions with the Customer Services Process Manager determined that customers affected by any variations in tariffs are informed of the changes no later than the next bill within the customer's billing cycle. Horizon Power informs the PUO of the change to a customer's tariff, and once confirmation has been received, Horizon Power advises Computershare of the relevant wording that needs to be included on the customer's next bill to adequately inform the customer of the tariff variation.</p> <p>Examination of an example bill with a tariff variation message determined that Horizon Power gives notice of a variation in tariffs, fees and charges in the required timeframe.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
273	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(2)	On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees and charges, including any alternative tariffs that may be available to that customer.	4	<p>Through enquiries with the Customer Service Process Manager, we noted upon request, CSRs are trained to provide customers information on Horizon Power's tariffs, fees and charges over the phone at no charge. All customers are advised upon sign-up that all fees and charges information can be found on Horizon Power's website as indicated by mandatory in-house call scripts used by the CSRs.</p> <p>Examination of the 'Pricing' section of Horizon Power's website and Horizon Power Electricity Tariffs and Charges Brochure noted that it includes information on Horizon Power's tariffs, fees and charges.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
274	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(3)	A retailer must give or make available to a customer the information requested on tariffs, fees and charges within 8 business days of the date of receipt and, if requested, provide the information in writing.	4	<p>Through enquiries with the Customer Service Process Manager, we noted upon request, CSRs are trained to provide customers information on Horizon Power's tariffs, fees and charges over the phone at no charge. CSRs aim to provide information over the phone immediately. However, where a customer requests tariffs, fees or charges information in writing, CSRs will email or mail the required information whilst speaking with the customer on the phone. Mail requests are processed overnight, and therefore complying with the 8 business day requirement under the Code of Conduct. All customers are advised upon sign-up that all fees and charges information can be found on Horizon Power's website as indicated by mandatory in-house call scripts used by CSRs.</p> <p>Examination of the 'Pricing' section of Horizon Power's website and Horizon Power Electricity Tariffs and Charges Brochure noted that it includes information on Horizon Power's tariffs, fees and charges.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
275	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(1)	On request, a retailer must provide a non-contestable customer with their billing data.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Services Manager confirmed that in no circumstances would Horizon Power charge a customer for the provision of billing data.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
276	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(2)	If a non-contestable customer requests billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with a retailer, the retailer must provide the data at no charge.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post, regardless of the requested timeframe. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Services Manager confirmed that in no circumstances would Horizon Power charge a customer for the provision of billing data.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
277	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(3)	A retailer must give the requested billing data under subclause 10.2(1) within 10 business days of the receipt of the request, or on payment of the retailer's reasonable charge for providing this data.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post, regardless of the requested timeframe. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. The Retail Services Manager confirmed that in no circumstances would Horizon Power charge a customer for the provision of billing data.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>able to view and download their historical billing and consumption data.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
278	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(4)	A retailer must keep a non-contestable customer's billing data for 7 years.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available billing data over the phone, through email or by post, regardless of the requested timeframe. Billing data is stored within Velocity and customers are able to obtain all available billing data from the date the customer created their account. All information in Velocity is backed up and indefinitely maintained on the system, with protocol being to never destroy any information/data stored in Velocity and therefore complying with the 7 years requirement of the Code of Conduct.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
279	Electricity Industry Act, section 82	Code of Conduct, clause 10.3	On request and at no charge, a retailer must provide a residential customer with information on the types of concessions available to the residential customer and the name and contact details of the organisation responsible for administering those concessions (if not the retailer).	4	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power has procedures in place to ensure residential customers are provided with the types of concessions available to them. CSRs are trained to direct customers to the "Concessions, Rebates and Subsidies" section on the Horizon Power website, where they can access all relevant information in regards to the types of concessions available to customers, as well as the name and contact details of the organisation responsible for administering those concessions. Should a customer request for this information to be provided in writing, CSRs are trained to provide this information in writing via email at no charge.</p> <p>Through review of Horizon Powers website, and training registers, it is noted that the CSRs are kept up-to-date via regular trainings and that all relevant concessions and contact details are present on the website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
280	Electricity Industry Act, section 82	Code of Conduct, clause 10.3A	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.	4	<p>Through enquiries with the Retail Services Manager we noted Horizon Power provides customers with written details on the obligation to make service standard payments at least once a year. The relevant service standard payment information is provided to customers by way of an 'On the Horizon' newsletter which is posted to customer's address every two months. We also noted that Horizon Power provides services standard payment information on the website under the 'Power Outages' section and in the Customer Charter. Customers can find all relevant service standards payment information under the 'Make a Claim' tab, as well directions on how to make a relevant claim.</p> <p>Review of Horizon Powers 'On the Horizon' newsletter, Customer Charter and website determined that information on Horizon Power's obligation to make payments to customers is outlined as required, including the amount of the payment and any eligibility criteria.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
281	Electricity Industry Act, section 82	Code of Conduct, clause 10.4	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will provide general information on cost effective and efficient ways to utilise electricity and the typical running costs of major domestic appliances upon request and at no charge to the customer. In the first instance, customers who contact Horizon Power seeking information will be directed to the 'Easy Ways to Save' section of the website. Additionally, depending on the type of information requested, CSRs have been trained to provide customers advice for being more energy efficient over the phone as well as promoting the use of Horizon Power App that allows customers to track their energy usage.</p> <p>Review of Horizon Power's website noted that the 'Easy Ways to Save' section provides information on cost effective and efficient ways to utilise electricity as well as typical running costs of major domestic appliances.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
282	Electricity Industry Act, section 82	Code of Conduct, clause 10.5	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.	4	<p>Through enquiries with the Senior Customer Service Officer, we noted upon request, Computershare staff are trained to provide general distribution information including:</p> <ul style="list-style-type: none"> Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; An explanation for any unplanned interruptions to electricity supply; Advice on protecting metering equipment; Advice on the customer's electricity usage so that it does not interfere with the operation of a distribution system or with supply to any other electrical installation; General information on safe use of electricity General information on quality of supply; and General information on reliability of supply. <p>The Senior Customer Service Officer advised that depending on the information being requested, the CSR will aim to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
283	Electricity Industry Act, section 82	Code of Conduct, clause 10.6	On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6.	4	<p>Through enquiries with the Senior Customer Service Officer, we noted upon request, Computershare staff are trained to provide general distribution including information required in clause 10.6 of the Code, this includes:</p> <ul style="list-style-type: none"> Information on the distributor's requirements in relation to the customer's proposed new electrical installation, or changes to the customer's existing electrical installation, including advice about supply extensions; An explanation for any unplanned or approved change in the quality of supply of electricity outside of the limits prescribed by law; 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> • An explanation for any unplanned interruptions to electricity supply; • Advice on protecting metering equipment; • Advice on the customer's electricity usage so that it does not interfere with the operation of a distribution system or with supply to any other electrical installation; • General information on safe use of electricity • General information on quality of supply; and • General information on reliability of supply. <p>The Senior Customer Service Officer advised that depending on the information being requested, the CSR will aim to address the enquiry over the phone or alternatively refer the customer to the 'Connections' section of the Horizon Power website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
284	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(1)	On request, a distributor must provide a customer with their consumption data.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available consumption data over the phone, through email or by post, regardless of the requested timeframe. Consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. Additionally, training is provided to CSRs which cover consumption information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
285	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(2)	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2) (a)-(b).	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available consumption data over the phone, through email or by post, regardless of the requested timeframe. Consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account.</p> <p>CSRs will aim to provide the requested information immediately over the phone including consumption data for a period less than the previous two years as well as consumption data in relation to a dispute with Horizon Power. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. Additionally, training is provided to CSRs which cover consumption information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
286	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(3)	<p>A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of:</p> <ul style="list-style-type: none"> - the request; or - payment of the distributor's reasonable charge for providing the consumption data (if payment is required and requested by the distributor within 2 business days of the request). 	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, Horizon Power will provide customers, free of charge, all available consumption data over the phone, through email or by post, regardless of the requested timeframe. Consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account. The Retail Services Manager confirmed that in no circumstances would Horizon Power charge a customer for the provision of consumption data.</p> <p>CSRs will aim to provide the requested information immediately over the phone. If the customer requests consumption data in writing the CSR will trigger the email or mail to be sent while speaking to the customer, therefore complying with the 10 business day requirement of the Code of Conduct. If the customer has a Horizon Power 'MyAccount', CSRs will direct customers to Horizon Power's website or App where customers are able to view and download their historical billing and consumption data. Additionally, training is provided to</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Customer Service staff which cover consumption information.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
287	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(4)	A distributor must keep a customer's consumption data for 7 years.	4	<p>Through enquiries with the Retail Services Manager, we noted consumption data is stored within Velocity and customers are able to obtain all available consumption data from the date the customer created their account. All information in Velocity is backed up and indefinitely maintained on the system, with protocol being to never destroy any information/data stored in Velocity and therefore complying with the seven year requirement as stipulated by the Code of Conduct.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
288	Electricity Industry Act, section 82	Code of Conduct, clause 10.8(1)	On request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts that are relevant to the customer or adopted by the distributor.	4	<p>Through enquiries with the Retail Services Manager, we noted upon request, a customer will be informed that information on distribution standards and metering arrangements can be obtained from the Horizon Power website. Review of the website noted the following:</p> <ul style="list-style-type: none"> Details are provided on Horizon Power's electricity supply obligations and voltage frequency and tolerance limits for electricity supply; Horizon Power's general metering requirements with the purpose to provide the electrical consulting and electrical contracting industry information on metering and connecting a customer are outlined; and Reference is made to the Approved Horizon Power Mandatory Link Criteria and the Horizon Power Metrology Procedure, both of which are approved by the ERA. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
289	Electricity Industry Act, section 82	Code of Conduct, clause 10.8(2)	A distributor must publish information on distribution standards and metering arrangements on its website.	4	<p>Through enquiries with the Retail Services Manager, we noted the website contains the following:</p> <ul style="list-style-type: none"> Details are provided on Horizon Power's electricity supply obligations and voltage frequency and tolerance limits for electricity supply; Horizon Power's general metering requirements with the purpose to provide the electrical consulting and electrical contracting industry information on metering and connecting a customer are outlined; and Reference is made to the Approved Horizon Power Mandatory Link Criteria and the Horizon Power Metrology Procedure, both of which are approved by the ERA. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
290	Electricity Industry Act, section 82	Code of Conduct, clause 10.9	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.	5	<p>Through enquiries with the Retail Services Manager, we noted all amendments to letters, bills, and publicly available documents are reviewed by Retail Services and Legal team prior to release to ensure they are expressed in a clear, simple, concise language and in a format that is easy to understand. Additionally, it was noted by the Retail Services Manager that in 2020, a Customer Experience Communication team was formed to develop customer written information.</p> <p>Review of the Customer Service Charter, customer bills and terms and conditions (both standard and non-standard), and particulars of contract noted they are presented in simple English, and are easy to understand.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
291	Electricity Industry Act, section 82	Code of Conduct, clause 10.10(1)	On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power have a process in place to ensure that a copy of the Code is appropriately provided to customers upon request and at no charge. Once a customer has agreed to enter into an agreement with Horizon Power and the CSR has logged the new</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>connection within Velocity, the system will automatically trigger a Welcome Letter to be sent to the customer. This letter states that a copy of the Code of Conduct for the Supply of Electricity to Small use Customers can be obtained on the Horizon Power website. If a customer requests information on where to obtain a copy of the Code a CSR will direct them to the Horizon Power website.</p> <p>Through review of Horizon Power's website we noted a copy of the Code of Conduct for the Supply of Electricity to Small Use Customers can be found and is available at no charge.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
292	Electricity Industry Act, section 82	Code of Conduct, clause 10.10(2)	A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power have a process in place to ensure that a copy of the Code is appropriately provided to customers upon request and at no charge. Once a customer has agreed to enter into an agreement with Horizon Power and the CSR has logged the new connection within Velocity, the system will automatically trigger a Welcome Letter to be sent to the customer. This letter states that a copy of the Code of Conduct for the Supply of Electricity to Small use Customers can be obtained on the Horizon Power website. If a customer requests information on where to obtain a copy of the Code a CSR will direct them to the Horizon Power website.</p> <p>Through review of Horizon Power's website we noted a copy of the Code of Conduct for the Supply of Electricity to Small Use Customers can be found and is available at no charge.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
294	Electricity Industry Act, section 82	Code of Conduct, clause 10.11(1)	On request and at no charge, a retailer and a distributor must make services available to a residential customer to assist the residential customer to interpret information provided by the retailer or distributor (including	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power provides Interpreter and TTY services at no charge to the customer. Upon request, Horizon Power will also provide large print copies to customers at no charge.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			independent multi-lingual and TTY services, and large print copies).		Examination of the Horizon Power Customer Charter, example customer bill, reminder notice and disconnection warning, noted that Horizon Power includes TTY and Interpreter Services National number and symbol that is accessible for customers with special information needs. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
295	Electricity Industry Act, section 82	Code of Conduct, clause 10.11(2)	For residential customers, a retailer and, if appropriate, a distributor, must include the information prescribed in subclause 10.11(2) (a) on its bills and bill-related information, reminder notices and disconnection warnings.	4	Through enquiries with the Customer Services Process Manager and review of key documents, we noted Horizon Power uses standardised bill templates, Disconnection Warnings, and Reminder Notices, that include the information prescribed in subclause 10.11(2)(a), namely the telephone number for TTY services. These documents are automatically used by Velocity to generate relevant Bills, Disconnection Warnings and Reminder Notices for customers when required. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
296	Electricity Industry Act, section 82	Code of Conduct, clause 10.12(1)	On request and at no charge, a distributor must advise a customer of the availability of different types of meters, as well as their suitability for the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.	4	Through enquiries with the Metering Services Manager, we noted Horizon Power only offer one type of meter (AMI) to small use customers which can be setup as standard or prepayment meters. In the event that a customer requests information related to metering, CSRs will direct the customer to the 'Metering Services' or 'Reading my meter' section of the Horizon Power website. On the Horizon Power website, customers may also obtain a copy of Horizon Power's Metrology Procedure. Where possible, CSRs will aim to provide information requested by customers over the phone and may also direct customer enquiries to the Customer Services Metering team located in the Bentley Office. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
297	Electricity Industry Act, section 82	Code of Conduct, clause 10.12(2)	On request, a retailer must advise a customer of the availability of different types of meters or refer the customer	4	Through enquiries with the Metering Services Manager, we noted Horizon Power only offer one type of meter (AMI) to small use customers which can be setup as standard or prepayment meters. In the event that a	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			to the relevant distributor for a response.		customer requests information related to metering, CSRs will direct the customer to the 'Metering Services' or 'Reading my meter' section of the Horizon Power website. On the Horizon Power website, customers may also obtain a copy of Horizon Power's Metrology Procedure. Where possible, CSRs will provide information requested by customers over the phone and may also direct customer enquiries to the Customer Services Metering team located in the Bentley Office. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
298	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(1)	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	4	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have an internal process in place for handling complaints and resolving disputes consisting of the following:</p> <ul style="list-style-type: none"> The Processing Customer Complaints Work Instructions has been developed to assist Horizon Power employees to log and process customer complaints; The Complaints Overview has been developed to provide Horizon Power employees an overview of what a complaint is, the complaint escalation process as well as timeframes to acknowledge and resolve customer complaints; The Ombudsman Complaints Work Instructions have been developed to assist staff with steps required to escalate a complaint to the Energy Ombudsman; In the first instance, customer complaints are handled by a CSR and will make every reasonable attempt to resolve the complaint. Complaints can be escalated to a Specialist CSR, Senior CSR or Team Leader should the need arise. This process is documented in the 'Escalation Process' section of the Complaints Overview. If required, a complaint will be referred to or sent directly to the Energy Ombudsman; All customer complaints are logged into Velocity. A weekly report of all outstanding complaints is extracted from Velocity and sent 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>to Computershare employees and to the RCMS by the Senior Customer Service Officer;</p> <ul style="list-style-type: none"> The Retail Services Manager and Customer Services Process Manager are responsible for maintaining and amending any internal processes in relation to handling customer complaints; and A suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
299	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(2)	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.	4	<p>Through enquiries with the Senior Customer Service Officer and examination of relevant documentation, we noted Horizon Power have an internal process in place for handling complaints and resolving disputes. The Retail Services Manager and Customer Services Process Manager are responsible for maintaining and amending any internal processes in relation to handling customer complaints. Additionally, a suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process.</p> <p>Examination of the Customer Charter, Processing Customer Complaints Work Instruction and Complaints Overview, noted that these documents have been created and designed to comply with the AS 2014 standard and addresses the complaints lodging and handling process as well as the timeframe requirements to respond to a complaint and the complaint escalation process. Information on Horizon Power's complaints handling process is available to all customers at no charge on the 'Feedback and complaints' section of the Horizon Power website as well as the Customer Charter which is also available on the website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
300	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	4	<p>Through enquiries with the Customer Services Process Manager and examination of the Horizon Power's Complaints Overview and Customer Charter, we noted when responding to a complaint, Horizon Power will</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>advise the customer that the complaint can be assessed by a senior employee. If the customer is not satisfied with how the complaint has been resolved internally, Horizon Power will advise the customer of the reasons for the outcome and that the complaint can be referred to the Energy Ombudsman. Should a customer request reasons for the decision made in writing, Horizon Power will do so via mail or email.</p> <p>When customers submit a complaint form through the online portal on the Horizon Power website, it is stated that a customer may have a complaint reviewed by a senior employee.</p> <p>The Retail Services Manager advised that a suite of training modules is offered to all Computershare staff, included in this suite of training is a module on the complaints process. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
301	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(4)	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.	4	<p>Through enquiries with the Retail Services Manager and examination of Horizon Power's Processing Customer Complaints Work Instructions, we noted written complaints can be received in the form of mail/fax, email or via an online feedback form. Customers who lodge a complaint by email or via an online feedback form are provided with an immediate automated acknowledgement. It is protocol for CSRs to acknowledge and respond to complaints received by mail/fax immediately upon receiving the complaint. All customer complaints are logged into Velocity and a weekly report of all outstanding complaints is extracted from Velocity by the Senior Customer Service Officer and sent to Computershare employees and to the RCMs to review. Additionally as part of Computershare Service Level Agreement with Horizon Power, all customer complaints are required to be acknowledged and responded to within three business days and resolved within 15 business days and therefore complying with the time requirement of the Code of Conduct.</p> <p>Through examination of Computershare's monthly SLA report, we noted all customer complaints were</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>acknowledged within 3 business days and resolved within 15 business days.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
302	Electricity Industry Act, section 82	Code of Conduct, clause 12.2	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will distinguish queries from complaints when responding to calls from customers. The Horizon Power Complaints Overview which is provided to the Customer Service team, distinguishes between queries and complaints. Additionally, a suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process.</p> <p>Examination of Horizon Power Complaints Overview noted it includes definition of a 'complaint' which has been checked and corroborated against the definition of a complaint, and the difference to a query as set out per the ERA guidelines.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
303	Electricity Industry Act, section 82	Code of Conduct, clause 12.3	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.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will direct customers who are seeking information that will assist them in utilising the complaints handling process to the Horizon Power website or the Customer Charter. The Horizon Power website and the Customer Charter are available to all customers at no charge. Additionally, a suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process.</p> <p>Examination of Horizon Power Customer Charter and website noted that they provide information regarding Horizon Power's complaints handling processes.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
304	Electricity Industry Act, section 82	Code of Conduct, clause 12.4	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).	4	<p>Through enquiries with the Senior Customer Service Officer, we noted in the rare event that a complaint is received outside of the scope of Horizon Power's functions, the customer will be referred to the relevant government department or organisation (if known). It was advised by the Senior Customer Service Officer, that no instance of this had occurred during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
305	Electricity Industry Act, section 82	Code of Conduct, clause 13.1	A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.	4	<p>Through enquiries with the Customer Services Process Manager and review of documentation, we noted Horizon Power will prepare information as directed by the ERA within the timeframes specified. This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates.</p> <p>We noted Horizon Power has prepared the relevant regulatory reports during the audit period using the templates and information provided by the ERA. These have been published on Horizon Power's public website.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
306	Electricity Industry Act, section 82	Code of Conduct, clause 13.2	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.	4	<p>Through enquiries with the Customer Services Process Manager and review of documentation, we noted Horizon Power will prepare information as directed by the ERA within the timeframes specified. This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates.</p> <p>Through review of this system, we confirmed that Horizon Power submitted the 2016/2017, 2017/18 and 2018/19 Annual Performance Reports for its retail licences within the timeframes specified by the ERA. Horizon Power was provided with a template of the reporting sheets to complete the report, fulfilling the obligation requirement of providing the report in the manner and form as specified by the ERA.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
307	Electricity Industry Act, section 82	Code of Conduct, clause 13.3	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: - 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.	4	Through enquiries with the Customer Services Process Manager and review of documentation, we noted Horizon Power will publish information as directed by the ERA within the timeframes specified. This is tracked through the CURA system, with task owners receiving notifications via email of upcoming due dates. Once the reports have been submitted and approved by the ERA, Horizon Power will receive direction to publish the reports on their website, available at no cost to customers. Should a customer request a hard copy in one of the regional offices, the document will be printed and provided at no cost. We confirmed that Horizon Power published its Annual Performance Reports for the period by the date specified by the ERA. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
308	Electricity Industry Act, section 82	Code of Conduct, clause 14.1(1)	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.	4	Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service standard payments to customers in the event supply is not reconnected within timeframes stipulated in Part 8 of the Code of Conduct. Customers are required to submit a relevant claim form to Horizon Power within 3 months of initially contacting Horizon Power for reconnection to be eligible. CSRs are trained to process service standard payments in Velocity, and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT. Through examination of Horizon Power's Customer Charter, we noted Horizon Power will make service standard payments of \$60 per day for the period that electricity remains disconnected up to a maximum of \$300 and therefore complying with the requirement as stipulated in Clause 14.1 of the Code of Conduct. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
309	Electricity Industry Act, section 82	Code of Conduct, clause 14.1(2)	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.1(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer.	4	Based on enquiries held with the Senior Customer Service Officer, it was concluded that as Horizon Power is a vertically integrated utility, and acts as both the retailer and distributor, it had not compensated a retailer for service standard payments made under clause 14.1(1) of the Code of Conduct during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
310	Electricity Industry Act, section 82	Code of Conduct, clause 14.2(1)	Subject to clause 14.6, a retailer must pay the specified compensation to a customer if: - it fails to comply with any of the procedures specified in Part 6 or 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 for failure to pay a bill.	4	Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service standard payments to customers in the event customers are wrongfully disconnected. Customers are required to submit a relevant claim form to Horizon Power within 3 months of the disconnection to be eligible. CSRs are trained to process service standard payments in Velocity, and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT. Through examination of Horizon Power's Customer Charter, we noted Horizon Power will make service standard payments of \$100 per day for the period that electricity remains disconnected with no limits on this payment and therefore complying with the requirement as stipulated in Clause 14.2 of the Code of Conduct. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
311	Electricity Industry Act, section 82	Code of Conduct, clause 14.2(2)	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.2(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer.	4	Based on enquiries held with the Senior Customer Service Officer, it was concluded that as Horizon Power is a vertically integrated utility, and acts as both the retailer and distributor, it had not compensated a retailer for service standard payments made under clause 14.2(1) of the Code of Conduct during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
312	Electricity Industry Act, section 82	Code of Conduct, clause 14.3(1)	Subject to clause 14.6, a retailer must pay the customer \$20 if the retailer has failed to acknowledge or respond	4	Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service standard payments to customers in the event that Horizon Power fails to acknowledge a	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			to a complaint within the timeframes prescribed in subclause 12.1(4).		<p>complaint. Customers are required to submit their request for payment within 3 months of initial contact to be eligible. CSRs are trained to process service standard payments in Velocity, and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through examination of Horizon Power's Customer Charter, we noted Horizon Power will make a service standard payment of \$20 if Horizon Power fails to acknowledge a complaint within 5 business days or respond to a complaint within 20 business days and therefore complying with the requirement as stipulated in Clause 14.3 of the Code of Conduct. Through enquiries held with the Senior Customer Service Officer, we note this has not occurred during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
313	Electricity Industry Act, section 82	Code of Conduct, clause 14.4(1)	Subject to clause 14.6, a distributor must pay the customer \$20 if the distributor has failed to acknowledge or respond to a complaint within the timeframes prescribed in subclause 12.1(4).	4	<p>Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service standard payments to customers in the event that Horizon Power fails to acknowledge a complaint. Customers are required to submit their request for payment within 3 months of initial contact to be eligible. CSRs are trained to process service standard payments in Velocity, and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through examination of Horizon Power's Customer Charter, we noted Horizon Power will make a service standard payment of \$20 if Horizon Power fails to acknowledge a complaint within 5 business days or respond to a complaint within 20 business days and therefore complying with the requirement as stipulated in Clause 14.4 of the Code of Conduct. Through enquiries held with the Senior Customer Service Officer, we note this has not occurred during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity</p>	N/A.	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					occurred during the audit period, therefore the obligation is not rated.			
314	Electricity Industry Act, section 82	Code of Conduct, clause 14.5	Subject to subclause 14.6, if a distributor disconnects a customer's supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer \$100 for each day that the customer was wrongfully disconnected.	4	<p>Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service standard payments to customers in the event customers are wrongfully disconnected. Customers are required to submit a relevant claim form to Horizon Power within 3 months of the disconnection to be eligible. CSRs are trained to process service standard payments in Velocity, and will make payments by crediting the customer's Velocity account balance. If requested by the customer, Horizon Power may also make direct service standard payments by cheque or EFT.</p> <p>Through examination of Horizon Power's Customer Charter, we noted Horizon Power will make service standard payments of \$100 per day for the period that electricity remains disconnected with no limits on this payment and therefore complying with the requirement as stipulated in Clause 14.6 of the Code of Conduct.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
315	Electricity Industry Act, section 82	Code of Conduct, clause 14.7(1)	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).	4	<p>Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service payments via the following methods:</p> <ul style="list-style-type: none"> • Crediting the customer's Velocity account balance; • Cheque; or • EFT payment. <p>Service standard payments made to customers are credited to the customer's Velocity account by default unless the customer requests direct payment.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
316	Electricity Industry Act, section 82	Code of Conduct, clause 14.7(2)	A distributor that is required to make a compensation payment for failing to satisfy a service standard under clauses 14.4 or 14.5 must do so in the manner specified in subclause 14.7(2).	4	<p>Through enquiries and process walkthroughs with the Senior Customer Service Officer, we noted Horizon Power will make service payments via the following methods:</p> <ul style="list-style-type: none"> • Crediting the customer's Velocity account balance; • Cheque; or • EFT payment. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Service standard payments made to customers are credited to the customer's Velocity account by default unless the customer requests direct payment.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
319	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	2	<p>Through enquiries with the Metering Services Manager and review of relevant documentation, we noted the current Horizon Power meters are aligned with the 2017 Horizon Power Metrology Procedure.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AML-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and Metrology Procedure and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether 	<p><u>Recommendation 8/2020:</u></p> <p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>they are meeting the accuracy requirements required of utility meters.</p> <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
320	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1) (a) (b) using dials, a cyclometer, an illuminated display panel or some other visual means.	4	<p>Through enquiries with relevant Horizon Power staff, examination of key documents and review of mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure specifically addresses this obligation at Section 2.1.1, Section 5.48 and 5.52 which collectively states when each meter is installed it must include a visual display which is readily accessed for metering reading. Reference material available on the Horizon Power website, such as the Field Instruction Manual and Field Practices Manual, provides general and specific detailed guidance and instruction to Line Crews regarding the installation of meters to meet the requirements of the WA Metering Code 2012. <p>Horizon Power has completed an updated Metrology Procedure for Metering Installations' as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components.</p> <p>It was noted during fieldwork that Horizon Power submitted a revised Metrology Procedure and revised Mandatory Link Criteria to the Authority for review and approval in December 2017.</p> <p>Since the completion of the AMI-exchange project in December 2016, Horizon Power operates approximately 48,563 AMI-enabled meters, made up of Landys and Gyr pattern-approved U1300, U3300 and U3400 series meters and EDM1 pattern approved Mk 7C meters direct connect metering installations and EDM1 pattern approved Mk10E</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>meters for low voltage current transformer metering installations, and EDM pattern approved MK10E variant, Landis and GYR EM5400 and SEL735 meters for high voltage metering installations. As per the Metering Code 2012 and Horizon Power's 2017 Metrology Procedure, meters capable of measuring both interval and accumulation energy data reads are considered to be accumulation meters, except where required to be interval meters of which Horizon Power has 160. These 160 meters have the required interface as per the Code and Horizon Power's Metrology Procedure.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
321	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	4	<p>Through enquiries with relevant Horizon Power staff, examination of key documents and review of mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure specifically addresses this obligation at Section 2.1.1, Section 5.48 and 5.52 which collectively states when each meter is installed it must include a visual display which is readily accessed for metering reading. Reference material available on the Horizon Power website, such as the Field Instruction Manual and Field Practices Manual, provides general and specific detailed guidance and instruction to Line Crews regarding the installation of meters to meet the requirements of the WA metering Code 2012. <p>Horizon Power has completed an updated Metrology Procedure for Metering Installations' as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components.</p> <p>It was noted during fieldwork that Horizon Power submitted a revised Metrology Procedure and revised Mandatory Link Criteria to the Authority for review and approval in December 2017.</p> <p>Since the completion of the AMI-exchange project in December 2016, Horizon Power operates approximately 48,563 AMI-enabled meters, made up of Landys and Gyr pattern-approved U1300, U3300 and U3400 series meters</p>	N/A.	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>and EDM1 pattern approved Mk 7C meters direct connect metering installations and EDM1 pattern approved Mk10E meters for low voltage current transformer metering installations, and EDM1 pattern approved MK10E variant, Landis and GYR EM5400 and SEL735 meters for high voltage metering installations. As per the <i>Code</i> and Horizon Power's 2017 Metrology Procedure, meters capable of measuring both interval and accumulation energy data reads are considered to be accumulation meters, except where required to be interval meters of which Horizon Power has 160. These 160 meters have the required interface as per the Code and Horizon Power's Metrology Procedure.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
322	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	4	<p>Through enquiries with the Metering Services Manager and examination of relevant documentation, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure and Mandatory Link Criteria specifically identify the obligation arising under Clause 3.16(1) of the <i>Code</i>, stating that Type 1 to Type 4 metering installations must include a communications link. Schedules 1 – 4 of Horizon Power's 2017 Metrology Procedure sufficiently identifies and addresses the relevant technical requirements under the <i>Code</i> relating to communications links, modems, and isolation devices. Section 3.5.9 of Horizon Power's 'Technical Requirement for Revenue Electricity Meters' Specification document states that meter communications shall comply with AS 62056 and AS 1284. Horizon Power's installation procedures provide for the inclusion of modem and isolation devices within metering installations (where required or otherwise), in accordance with its prescribed documents and technical specifications, the WA Distributions Connections Manual, and relevant telecommunications regulations. The Metering Services Manager has established that modems and isolation devices sourced and used 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>were approved under relevant telecommunications regulations.</p> <ul style="list-style-type: none"> All metering assets installed by Horizon Power are tested in the Horizon Power metering laboratory to ensure they meet all of the legislative and environmental obligations required of Horizon Power. Horizon Power's daily data collection read success rate for advanced meters over was sighted to average around 99% over a 7 day period. The Senior Metering Technician demonstrated the specific type of patch leads predominantly used on Horizon Power's metering installations for isolation devices were ACMA A-Tick Certified N10227 and meet applicable Australian Standards. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
323	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	<p>Through enquiries with Metering Services Manager and examination of relevant documentation, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure and other documents published on its website require that meters associated with types 1 to 5 metering installations be capable of separately registering and recording flows in each direction where bi-directional energy flows. All pattern-approved meter types exchanged under the AMI-exchange project are capable of recording bi-directional energy flows in each direction, i.e. net reading. The AMI-exchange project was completed in December 2016. Horizon Power's documentation of each meter pattern-type's software configuration developer settings, confirmed that all exchanged meter pattern-types allow for import and export kWh measurements to be logged and read. Inspection system processes and procedures requiring an electrician to lodge a notice of completion prior to a metering installation being energised, and automatic high/low validation checks performed on 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>energy data through mData21 and Velocity, provided monitoring and preventative means for Horizon Power to ensure no bi-directional flows occur.</p> <ul style="list-style-type: none"> As at the end of the performance audit period there were 19 meters yet to be exchanged with an advanced meter. It was confirmed that bi-directional electricity flows do not occur at each metering point for all 19 meters. The Metering Services Manager confirmed there have been no known instances during the audit period where bi-directional flows were occurring at a metering point with a metering installation that is not capable of separately measuring and recording electricity flows in each direction. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
324	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	4	Based on enquiries held with the Metering Services Manager, it was concluded that as Horizon Power remained both the network operator and sole retailer, distributor and metering data agent on its network during the audit period, no users could be in a position to notify Horizon Power of changes in a metering point resulting in bi-directional flows. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
325	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <ul style="list-style-type: none"> the net electricity production transferred into the network that exceeds electricity consumption; and the net electricity consumption transferred out of the network that exceeds electricity production. 	4	<p>Through enquiries with Metering Services Manager and examination of relevant documentation, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure and other documents published on its website require that meters associated with a metering installation at any connection point be capable of separately registering and recording flows in each direction where bi-directional energy flows. 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> All pattern-approved meter types exchanged under the AMI-exchange project are capable of recording bi-directional energy flows in each direction, i.e. net reading. The AMI-exchange project was considered completed by December 2016. Horizon Power's documentation of each meter pattern-type's software configuration developer settings, confirmed that all exchanged meter pattern-types allow for import and export kWh measurements to be logged and read. Inspection system processes and procedures requiring an electrician to lodge a notice of completion prior to a metering installation being energised, and automatic high/low validation checks performed on energy data through mData21 and Velocity, provided monitoring and preventative means for Horizon Power to ensure no bi-directional flows occur. There have been no known instances during the audit period where bi-directional flows were occurring at a metering point with a metering installation that is not capable of separately measuring and recording electricity flows in each direction. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
326	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network that is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	3	<p>Through enquiries with the Metering Services Manager we noted every new connection must follow a process in mData21 and Velocity whereby the customer's installation can only be connected by the issuance of a "connection service order" to one of Horizon Power's crews, resulting in a connection point being established with a metering installation.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately</p>	<p><u>Recommendation 9/2020:</u></p> <p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations. Through enquiries with Metering Services Manager, it was confirmed that:</p> <ul style="list-style-type: none"> The AMI-exchange project was completed in December 2016. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises. Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
327	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	2	Through enquiries with the Metering Services Manager and review of the Horizon Power Metrology Procedure, we noted Horizon Power provide, install, operate and maintain the metering installation in the manner prescribed under clause 3.5(3) of the Electricity Industry (Metering) Code 2012, namely:	<p><u>Recommendation 10/2020:</u></p> <p>Horizon Power to continue working with the community to replace the remaining</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Transmission Licence, condition 4.1.1				<ul style="list-style-type: none"> The Metrology Procedure was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1 of the procedure and came into effect on the 3rd of January 2018, with a draft submitted to the Authority for review on 10 April 2017. Amendments by the Authority were issued in June 2017. Prior to this, the Metrology Procedure used was from 2006. As the applicable 2006 Metrology Procedure does not specifically identify and capture Horizon Power's current AMI-enabled fleet of meters, no strong inferences have been drawn as to the adequacy of control provided by the metrology procedure. We noted Horizon Power had previously drafted an amended metrology procedure in 2014, however this was retracted. For the interim period until the completion of installation for all advanced meters in 2017, Horizon Power adopted a draft of the 'Western Australian Electricity Market Metrology Procedures for Metering Installations' as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components. Under clause 1.2.1 of the Procedure, the purpose is to provide guidance on the correct provision, installation and maintenance of metering installations in line with the principles of the Code. The procedure details the Metering installation types and accuracy requirements in line with the Electricity Industry (Metering) Code 2012. In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed. In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations. 	19 non-compliant meters.		

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
328	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	<p>Through enquiries with the Metering Services Manager and examination of Horizon Power's Metrology Procedure, we noted:</p> <ul style="list-style-type: none"> A metering point is defined as a point on the network at which energy data measurement takes place (i.e. the connection point). A metering installation is designed for each metering point in order to measure energy data, and is designated within the Horizon Power's mData21 metering registry as a revenue meter. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Horizon Power's standard practice is for the connection point and metering point to be the same for all type 1 to 6 meters installed on its network. If a metering installation for a connection point is identified as not meeting the requirements under the WA Distributions and Connections Manual and electricity regulations, it is failed under Horizon Power's network operator fault note and they are given a period of time to fix the issues and if not, then de-energised until it is made compliant. Horizon Power has policies, procedures, systems and training in place to ensure metering points on its network are located as close as possible to the connection point. No metering installations were created during the audit period where the metering point and connection point were located at different points. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
329	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period, thus there were no applicable service level agreements in place, or persons to impose such charges on. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
330	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	2	<p>Through enquiries with the Metering Services Manager, we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p> <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>These were identified as part of the 2016 AMI Exchange Program and while numbers of non-compliant meters have reduced over the audit period, Horizon Power have continued to communicate with the 19 customers informing them of the non-compliant meters.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
331	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	<p>Through enquiries with the Metering Services Manager, and examination of relevant documentation, we noted:</p> <ul style="list-style-type: none"> Horizon Power's 2017 Metrology Procedure and Mandatory Link Criteria specifically identify the obligation arising under Clause 3.16(1) of the <i>Code</i>, stating that Type 1 to Type 4 metering installations must include a communications link. Schedules 1 – 4 of Horizon Power's 2017 metrology procedure sufficiently identifies and addresses the relevant technical requirements under the <i>Code</i> relating to communications links, modems, and isolation devices. Section 3.5.9 of Horizon Power's 'Technical Requirement for Revenue Electricity Meters' Specification document states that meter communications shall comply with AS 62056 and AS 1284. Horizon Power's installation and inspection procedures provide for the inclusion of modem and isolation devices within metering installations (where required or otherwise), in accordance with its prescribed documents and technical specifications; 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>the WA Distributions Connections Manual; and relevant telecommunications regulations.</p> <ul style="list-style-type: none"> The Metering Services Manager confirmed that Horizon Power has modems and isolation devices sourced and used were approved under relevant telecommunications regulations. The Senior Metering Technician demonstrated the specific type of patch leads predominantly used on Horizon Power's metering installations for isolation devices were ACMA A-Tick Certified N10227 and meet applicable Australian Standards. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
332	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	<p>Through enquiries with the Metering Services Manager supplemented with an examination of mData21, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. Horizon Power has implemented measures to:</p> <ul style="list-style-type: none"> Ensure data held in mData21 is secured from unauthorised local or remote access by granting role based access at the Windows active directory level and two factor authentication, token, for remote access into the mData21 platform. Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network. Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels. Ensure anti tampering of meters by battery operated hidden switches within the meter box and preserving the integrity of the meters. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
333	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code.	2	<p>Through enquiries with the Metering Services Manager, we noted Horizon Power document the requirements of the metering type installations as specified in Table 3 in Appendix 1 of the Code within the Horizon Power Metrology Procedure. The requirements to be documented for each metering type installation are as follows:</p> <ul style="list-style-type: none"> • Annual throughput at connection point; • Maximum allowable overall error at full load – Active; • Maximum allowable overall error at full load – Reactive; • Minimum acceptable class or standard of components; • Clock error (seconds per month); • Minimum meter types; and • Measurement for reactive energy required. <p>Review of the Code and the Metrology Procedure noted the documents were aligned.</p> <p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that, both single and three phase meters, were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016 Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and we noted all bar 19 meters on the Horizon Power network comply. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted:</p>	<p><u>Recommendation 11/2020:</u></p> <p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussion are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>This was raised in the 2017 EIRL2 Performance Audit as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. Eight have been replaced over the audit period as a result of the customer leaving the premises.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
334	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	2	<p>Through enquiries with the Metering Services Manager and review of relevant documentation, we noted the meters are reviewed in the design phase and at the time of installation, the CT and VT requirements are advised to the customer.</p> <p>Sample testing was conducted over meters for alignment with the installation types and accuracy requirements in the Electricity Industry (Metering) Code 2012 and the Horizon Power Metrology Procedure 2017 and we noted all meters comply on the Horizon power network. There are currently 19 meters on the Horizon Power which have not transferred over to the new AMI network, however, none of these fall above 1000 volts and require a VT with an annual consumption below 750MWh.</p> <p>This was raised in the 2017 EIRL2 Performance Audit, the 2017/2018 and 2018/2019 Annual Compliance Reports as non-compliant, with 23 meters associated with customers who refused to allow Horizon Power to exchange their current meter. All of those meters that fall above 1000 volts and require a VT with an annual consumption below</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>750MWh have been replaced, resulting in Horizon Power being compliant with this obligation.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
335	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	<p>Through enquiries with the Metering Services Manager and Senior Metering Technician, and examination of relevant documents we noted:</p> <ul style="list-style-type: none"> Horizon Power relies on its Metrology Procedure and Metering Management Plan to ensure that its meters meet the required accuracy requirements under the <i>Code</i>. Where a metering installation is identified as measuring outside the allowed accuracy limits, Horizon Power will replace the meter with one that is measuring accurately, or instruct the customer to replace the metering installation with one that meets the prescribed accuracy requirements. The only circumstance in which Horizon Power would consider applying compensation to a metering installation is if replacement of the meter or alteration to the metering installation so that it meets the prescribed accuracy requirements, is not possible. Even in this scenario, Horizon Power would apply compensation within its digital systems (i.e. mData21) rather than within the physical meter itself. There were no instances where compensation was carried out within a meter on Horizon Power's network during the audit period. <p>Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not carried out compensation with their meters during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
336	Distribution Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers	4	Through enquiries with the Metering Services Manager and examination of key documents, review of Horizon	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.		<p>Power's metering database system mData21, and sample testing, we noted:</p> <ul style="list-style-type: none"> Photographs of each meter pattern-type, and documentation of each meter pattern-type's software configuration developer settings, confirmed that all exchanged meter pattern-types allow for: <ul style="list-style-type: none"> (a) Physical access to a display of measurements and data logged on the meter at the metering point, via digital display panels, optical ports; and (b) Remote access through access points connecting AMI-enabled meters to Horizon Power's Silver Spring Networks, which remotely transfers energy data reads at 15 minute intervals from each meter which can be viewed through the SSN-UIQ software suite and the MDR. The 15 meters associated with customers who have refused to allow the exchange to an advanced meter were all noted to be electronic 'Ampy Email' pattern-type meters. There was no indication that meters of this type were non-compliant with regards to this specific obligation. <p>Based on enquiries held with the Metering Services Manager, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
337	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	3	<p>Through enquiries with the Metering Services Manager and review of the Horizon Power Metrology procedure, we noted Horizon Power have aligned their procedure with the requirement to ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p> <p>Sample testing was conducted over meters for alignment with the installation types and collection of data requirements in the Electricity Industry (Metering) Code 2012 and we noted all meters on the Horizon Power network comply with the obligation. All of the newly implemented AMI meters permit the collection of data</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>within the time specified in the applicable service level agreement for at least the percentages specified. For those 19 meters remaining from the exchange program, all have the ability to collect data within the time specified for the percentages specified.</p> <p>This was raised in the 2017 EIRL2 Performance Audit, 2017/2018 and 2018/2019 Annual Compliance Reports as non-compliant, however, as this obligation relates to the percentages and collection of data rather than accuracy requirements, it is deemed to have been incorrectly grouped in the reporting and as such, Horizon Power is compliant with requirement under this obligation.</p> <p>Based on enquiries, examination of documentation, and walkthroughs, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
338	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	Based on enquiries held with Metering Services Manager, it was concluded that Horizon Power did not have any users accessing its network during the audit period and therefore there were no corresponding service level agreements during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
340	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	2	<p>Through enquiries with the Metering Services Manager, it was identified that:</p> <ul style="list-style-type: none"> Horizon Power refers to and acts in accordance with its approved 2017 Metrology Procedure and Metering Management Plan documents in order to ensure compliance with this obligation. The meter testing Horizon Power undertakes is for advanced meters which were installed under the Advanced Metering Installation (AMI) exchange project that completed prior to this audit period in December 2016. The Metering Services Manager confirmed that testing had been planned on 305 meters in line with AS1284.13 and all populations passed. <p>Examination of the Metrology Procedure and reference to associated documents, we noted:</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Section 7 Testing and Inspection of Meters correctly identifies and addresses the requirement for systematically sampling and testing meters in accordance with the 2012 Metering Code. Section 7 of the Metrology Procedure specifically addresses this obligation by stipulating that the Metering Management Plan must include, as a minimum, the requirements under AS 1284:13. A comparison of the requirements under the Metrology Procedure against the 2012 Metering Code did not identify any inconsistencies that would result in non-compliance. AS 1284:13 requires that whole-current meters for which new or amended pattern approval has been received must be tested at least once in the first three years. True programmed installation of these meters was completed before 30 June 2018. <p>Sample testing was conducted over the meter tests conducted and noted they were tested in line with AS1284.13.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
341	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(2)	Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	2	<p>In 2011, sample meter testing was performed by Formway Group and it was confirmed that both single and three phase meters were greater than the allowable accuracy limits, therefore the entire population of meters were deemed to have failed.</p> <p>In 2015 and 2016, Horizon Power replaced electricity meters through the Meter Exchange Project. Through this project, Horizon Power has now installed approximately 48,563 advanced meters. As of completion of the AMI-exchange project in December 2016, these metering installations meet or exceed the standards required for installations.</p> <p>Through enquiries with the Metering Services Manager, it was confirmed that:</p>	<p><u>Recommendation 12/2020:</u></p> <p>Horizon Power to continue working with the community to replace the remaining 19 non-compliant meters.</p>	A	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The AMI-exchange project was completed in December 2016. As at the end of the audit period, Horizon Power had 19 meters on its network which had not yet been exchanged. For the metering installations associated with these 19 meters, it was noted: <ul style="list-style-type: none"> 4 have not been able to be exchanged due to quality concerns of the customers meter box. Discussions are currently underway with the customers to have this completed; and 15 were associated with customers who have refused to allow Horizon Power to exchange their current meter with an advanced meter despite Horizon Power's best endeavours to reach agreements to allow for the exchange. These 15 meters are not verified, and have not been subsequently individually tested to identify whether they are meeting the accuracy requirements required of utility meters. <p>As Horizon Power still had meters in operation of the same pattern types that had failed the 2011 Formway Group sample meter testing, which, was conducted more than three years ago, Horizon Power is deemed non-compliant with this obligation during the audit period.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, however Horizon Power was non-compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>			
342	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	<p>Through enquiries with the Metering Services Manager and examination of policies and procedures, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure schedules outline the design requirements for metering installations for Type 1 to Type 7 metering points. Design standards are referred to by meter technicians when installing metering installations and are kept in both digital and hard-copy form on-site. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Installations are inspected for compliance with the WA Distributions Connections Manual in accordance with Horizon Power's inspection system processes and procedures. Meters in use on Horizon Power's network after completion of the AMI-exchange project were all examined and found to be pattern-approved under NMI M6 and meet Australian Standards. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
343	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	4	<p>Through enquiries with the Metering Services Manager and Senior Metering Technician and examination of policies and procedures, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure schedules outline the design requirements for metering installations for Type 1 to Type 7 metering points. Design standards are referred to by meter technicians when installing metering installations and are kept in both digital and hard-copy form on-site. Installations are inspected for compliance with the WA Distributions Connections Manual in accordance with Horizon Power's inspection system processes and procedures. Meters in use on Horizon Power's network after completion of the AMI-exchange project were all examined and found to be pattern-approved under NMI M6 and meet Australian Standards. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
344	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry Metering Code, clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	<p>Through enquiries with the Metering Services Manager and examination of photographic evidence of metering installations and associated service orders, we noted:</p> <ul style="list-style-type: none"> Each installation on Horizon Power's network contains fuses, which permit the isolation of metering equipment to allow maintenance to occur on-site. Horizon Power's standard practice is to remove a meter from the metering installation and replace it 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				<p>with a new or reconfigured meter, to allow maintenance and testing of metering equipment to occur in-house at Horizon Power's Bentley office using accredited testing equipment.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
345	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	<p>Through enquiries with Metering Services Manager and Senior Metering Technician, supplemented by a review of relevant documentation, we noted Horizon Power maintains copies of the required CT and VT drawings connected to its network within CS16.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
346	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
347	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(3)(c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	<p>Through enquiries with the Metering Services Manager and examination of policies and procedures, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure schedules outline the design requirements for metering installations for Type 1 to Type 7 metering points. Horizon Power installs full check metering installations to the same specification as the associated revenue meter for a metering point. Horizon Power installs and maintains all meters in-house, including high voltage installations and associated check meters. Documentation, including photographs of installations and completed service orders, are stored digitally and within mData21. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Drawings associated with high voltage installations and meters have been designed to align the WA electricity safety standards. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
348	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	4	<p>Through enquiries with the Metering Services Manager and Senior Metering Technician and examination of policies and procedures, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure schedules outline the design requirements for metering installations for Type 1 to Type 7 metering points. Horizon Power installs full check metering installations to the same specification as the associated revenue meter for a metering point. Horizon Power installs and maintains all meters in-house, including high voltage installations and associated check meters. Documentation, including photographs of installations and completed service orders, are stored digitally and within mData21. Drawings associated with high voltage installations and meters have been designed to align the WA electricity safety standards. <p>The Metering Services Manager confirmed that no partial check meters were installed by Horizon Power during the audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
349	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 in Appendix 1.	2	<p>Through enquiries with the Metering Services Manager, examination of documentation, and walkthroughs of mData21 we noted all metering installations on the Horizon Power network are now considered to meet the requirements of the Code and Horizon Power's metrology procedure. The Horizon Power Metrology Procedure details the requirements of Table 3, and are inbuilt to the new AMI meters. Where an issue is flagged in a meter, the Metering Engineers will receive notification through mData21. A Must read Service Order will be raised, and if required, a field technician will attend the site to rectify</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>the issue. The meter will be replaced, with the faulty meter sent to Horizon Power's Bentley office for inspection.</p> <p>Sample testing was conducted over meters that did not comply with the Table 3 in Appendix 1 and we noted they were replaced with meters of a higher class accuracy in accordance with the obligation.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
355	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	<p>Through initial discussions with the Metering Services Manager and the Retail Services Manager, reference to previous performance audits, and information supporting the assessment that obligations relating to 'users' are not assessable, we noted requirements relating to Code Participants were potentially not relevant to Horizon Power or were not engaged with for the purposes of this obligation during the audit period.</p> <p>As per Clause 1.2 of the Electricity Industry (Metering) Code 2012, code participant is defined as each of the following:</p> <ul style="list-style-type: none"> a. network operator; b. retailer; c. generator; d. electricity networks corporation acting as the metering data agent; e. user who is not a retailer or generator and has an access contract at a connection point on a network of which the network operator is a Code Participant; f. The IMO to the extent that the market rules provide; and g. The Economic Regulatory Authority (the Authority). <p>Through enquiries with the Metering Services Manager and consideration of the roles of the IMO and the Authority, it was determined that:</p> <ul style="list-style-type: none"> • The note associated with the definitions of 'network operator', 'retailer', and 'generator' states that under Clause 1.2, their respective definitions only apply to 	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>certain network operators / retailers / generators, not all.</p> <ul style="list-style-type: none"> Clause 1.2 states that the code applies to a network operator (Horizon Power) only to the extent that a condition of a licence requires it to do so. Therefore, obligations referring to 'code participants' is assessed as only applying to Code Participants who are related to the network associated with Horizon Power's licence. There were no relevant code participants falling under the definition of Clause 1.2 (a)(b)(d)(e). It was confirmed by the Retail Services Manager that licensed generators connected to Horizon Power's network had not made a request for enhanced technology features in Horizon Power's metering installations under Clause 3.20(1). It was confirmed by the Metering Services Manager that the IMO and Authority would not make requests for enhanced technology features in Horizon Power's metering installations under Clause 3.20 (1), and had not done so during the audit period. <p>Based on enquiries held with the Metering Services Manager and Retail Services Manager, it was concluded that Horizon Power had not received a request by a code participant to provide enhanced technology features during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>			
356	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
357	Distribution Licence, condition 4.1.1 Integrated	Electricity Industry Metering Code, clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as	2	Through enquiries with Metering Services Manager and examination of Horizon Power's metrology procedure and SSN-UIQ software, we noted:	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		prescribed. Time drift must be measured over a period of 1 month.		<ul style="list-style-type: none"> Horizon Power's Metrology procedure adequately identifies the accuracy requirements for meters containing an internal real time clock under this obligation. Meters installed on Horizon Power's network after the completion of the AMI-exchange project were pattern approved, which addresses the requirements for time accuracy. Monitoring of the advanced meters time accuracy requirements is performed through SSN-UIQ software, with meters internal time clocks able to self-sync with the meters NIC card, which syncs with the SilverSprings network through access points on the network. <p>Sample testing was conducted and we noted time drift was measured over a period of one month, with the internal real time clock maintaining time accuracy as prescribed.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
358	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	<p>Through enquiries with the Metering Services Manager and examination of Horizon Power's metrology procedure, we noted:</p> <ul style="list-style-type: none"> Horizon Power's metrology procedure adequately captures the requirement for this obligation under section 2.2.5. All meters on Horizon Power's network possess the capability for storing energy data for the required periods, as evidenced by pattern-approval of the meters and documentation of each pattern-type meter's software configuration <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
359	Distribution Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.22	A network operator providing one or more metering installations with enhanced technology features must	4	<p>Through confirmation with the Metering Services Manager and examination of Horizon Power's Metrology Procedure and relevant metering software, we noted Horizon Power:</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.		<ul style="list-style-type: none"> Has recognised its requirement to maintain a licence for access to applicable metering software within its Metrology Procedure (section 2.2.7) Manages all metering activities in-house including maintenance of metering database, mData21, which Horizon Power owns the licence to operate. Is licensed to use meter specific software including EMPWin+ and EZ View. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
360	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
361	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
362	Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24A(1)	If a retailer requests a network operator to install a pre- payment meter at a connection point, then the pre-payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	4	<p>Based on enquiries held with the Metering Services Manager, and examination of Horizon Power's Metrology Procedure, we noted:</p> <ul style="list-style-type: none"> Clause 2.1.2 of the procedure states where prepayment meters are installed, Horizon Power will comply with technical requirements in Part 9 of the Code of Conduct. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The Metrology Procedure was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1. of the procedure. A suite of training modules are offered to employees which provide guidance to abide with Horizon Power's obligations under the Metering Code and Code of Conduct. <p>It was confirmed, through enquiries held with the Metering Services Manager that Horizon Power complies with Part 9 of the Code of Conduct when installing pre-payment meters at a connection point.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
363	Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24B(1)	If a retailer requests a network operator to replace a pre- payment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct.	4	<p>Based on enquiries held with the Metering Services Manager, and examination of Horizon Power's Metrology Procedure, we noted:</p> <ul style="list-style-type: none"> The Metrology Procedure was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1 of the procedure. When replacing a pre-payment with a standard meter, Horizon Power will deactivate the pre-payment functionality of the meter at the connection point and activate functionality of the standard meter. In doing so, Horizon Power will render pre-payment meters as non-operational and standard meters as operational. A suite of training modules are offered to employees which provide guidance to abide with Horizon Power's obligations under the Metering Code and Code of Conduct. <p>It was confirmed, through enquiries held with the Metering Services Manager that Horizon Power complies with the Metering Code and the Code of Conduct when replacing pre-payment meters at a connection point.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
364	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.27	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.	4	Based on enquiries and examination of documentation held with the Retail Services Manager, it was concluded that Horizon Power had not contracted out their metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
365	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	Based on enquiries and examination of documentation held with the Retail Services Manager, it was concluded that Horizon Power had not contracted out their metering installation during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
366	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	<p>Through enquiries with the Metering Services Manager and the Cyber & Information Security Officer, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. This includes standing data and energy data for each metering point on its network.</p> <p>We noted, during the 2017 Performance Audit, a non-compliance was raised against this obligation, however, we noted the issues raised were in relation to standing data comprising at least the items specified in clause 4.3(1) of the Code, which falls under obligation 370 specifically and had, at the time of reporting, been grouped together with Obligation 366. We therefore conclude that this prior non-compliance does not relate to obligation 366.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
367	Distribution Licence, condition 4.1.1 Integrated Regional	Electricity Industry Metering Code, clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods	4	Through enquiries with the Cyber & Information Security Officer, supplemented with an examination of mData21, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. Horizon Power has implemented measures to:	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).		<ul style="list-style-type: none"> Ensure data held in mData21 is secured from unauthorised local or remote access by granting role based access at the Windows active directory level and two factor authentication, token, for remote access into the mData21 platform. Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network. Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels. Ensure anti tampering of meters by battery operated hidden switches within the meter box and preserving the integrity of the meters. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
368	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	<p>Through enquiries with the Cyber & Information Security Officer, supplemented with an examination of Horizon Power's IT Disaster Recovery Plan, we noted Horizon Power has developed a disaster recovery plan for the metering database mData21.</p> <p>The disaster recovery plan for the mData21 application was tested annually during the audit period, which includes a series of fail over and fail back testing of mData21 with specifies a 12 hour target timeframe to rebuild the metering database following any disaster.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
370	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	4	<p>Through enquiries with the Metering Services Manager and the Cyber & Information Security Officer, we noted Horizon Power manages all metering services in-house, with the storage of meter data within mData21. This includes standing data and energy data for each metering point on its network.</p> <p>It was identified during testing that mData21 does not contain all standing data items required under Table 2 'Description and designated source of standing data to be</p>	<p>Recommendation 13/2020:</p> <p>Horizon Power to finalise draft Communication Rules to remove, modify or add any requirement in clause 4.3(1) for standing data that is</p>	B	2

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				<p>contained in the registry'. For example the length of network between the metering point and the substation it's not captured within mData21 or elsewhere within the organisation. The standing data items required under Table 2 identified as omitted from mData21 did not directly impact the customer.</p> <p>It was additionally noted that during fieldwork that, Horizon Power was in the process of drafting a set of Communication Rules. In assessing a recommended action plan, it was considered that in accordance with Clause 4.3(3) of the Code, Horizon Power may use its communication rules, once approved and published, to remove, modify or add any requirement in clause 4.3(1) for standing data.</p> <p>Previously, it was recommended that Horizon Power consider updating the draft communications rules document to remove, modify or add any requirement in clause 4.3(1) for standing data that is currently omitted from mData21. The communication rules are still in draft as negotiations are currently underway with another retailer to grant access to Horizon Power's network, at which point Communication Rules will be required. These are expected to be released in final by July 2020.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed and Horizon Power was not compliant with the obligation during the audit period, resulting in a minor impact on customers or third parties.</p>	currently omitted from mData21.		
371	Distribution Licence, condition 54.1.1 Generation Licence, condition 54.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.4(1)	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.	5	<p>Through enquires held with Metering Services Manager and the Retail Services Manager and consideration of the roles of the IMO and the Authority, it was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; It was confirmed by the Retail Services Manager that there we no discrepancies between energy data held in a metering installation and in the metering database that affected licensed generators connected to Horizon Power's networks; 	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> It was confirmed by the Metering Services Manager that the IMO and Authority would not be considered an 'affected' code participant in the event of a discrepancy between energy data held in a metering installation and in the metering database. <p>Based on enquiries held with the Metering Services Manager and Retail Services Manager, it was concluded that there were no instances of a discrepancy between energy data held in a metering installation and in the metering database that affected a code participant during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>			
374	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1), then the network operator must update the registry to address the issue.	4	<p>Through enquires held with Metering Services Manager and the Retail Services Manager and consideration of the roles of the IMO and the Authority, it was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; It was confirmed by the Retail Services Manager that licensed generators connected to Horizon Power's network had not notified Horizon Power of a change to, or inaccuracy in, an item of standing data; It was confirmed by the Metering Services Manager that the IMO and Authority would not notify Horizon Power of a change to, or inaccuracy in, an item of standing data, and had not done so during the period. <p>Based on enquiries held with the Metering Services Manager and Retail Services Manager, it was concluded that Horizon Power did not have or engage with any code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
375	Distribution Licence, condition 4.1.1 Integrated Regional Licence,	Electricity Industry Metering Code, clause 4.6(2)	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a	4	<p>Through enquires held with Metering Services Manager and the Retail Services Manager and consideration of the roles of the IMO and the Authority, it was determined that:</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	condition 4.1.1 Transmission Licence, condition 4.1.1		change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.		<ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power's networks during the audit period; It was confirmed by the Retail Services Manager that licensed generators connected to Horizon Power's network had not notified Horizon Power of a change to, or inaccuracy in, an item of standing data; It was confirmed by the Metering Services Manager that the IMO and Authority would not notify Horizon Power of a change to, or inaccuracy in, an item of standing data, and had not done so during the period. <p>Based on enquiries held with the Metering Services Manager and Retail Services Manager, it was concluded that Horizon Power did not have or engage with any code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>			
376	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
377	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
378	Distribution Licence, condition 4.1.1 Integrated Regional	Electricity Industry Metering Code, clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		prescribed methods, using a password provided by the network operator which provides 'read only' access.		period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
379	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	4	<p>Through enquiries with the Customer Services Process Manager, we noted all metering services are managed internally by Horizon Power. Horizon Power stores all meter data within mData21, which has control frameworks in place with measures to:</p> <ul style="list-style-type: none"> • Ensure data held in mData21 is secured from unauthorised local or remote access by granting role based access at the Windows active directory level and two factor authentication, token, for remote access into the mData21 platform; • Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network; • Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels; and • Ensure anti tampering of meters by battery operated hidden switches within the meter box and preserving the integrity of the meters. <p>Through examination of Horizon Power IT Policy Documents, we noted Horizon Power has strict guidelines and security controls in affect to ensure energy data is secured from unauthorised access.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
380	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	<p>Through enquiries with the Customer Services Process Manager, we noted all metering services are managed internally by Horizon Power. Horizon Power stores all meter data within mData21, which has control frameworks in place with measures to:</p> <ul style="list-style-type: none"> • Ensure data held in mData21 is secured from unauthorised local or remote access by granting role based access at the Windows active directory level 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>and two factor authentication, token, for remote access into the mData21 platform;</p> <ul style="list-style-type: none"> Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network; Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels; and Ensure anti tampering of meters by battery operated hidden switches within the meter box and preserving the integrity of the meters. <p>Through examination of Horizon Power IT Policy Documents, we noted Horizon Power has strict guidelines and security controls in affect to ensure energy data is secured from unauthorised access.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
381	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	<p>Through enquiries with the Customer Services Process Manager, we noted all metering services are managed internally by Horizon Power. Horizon Power stores all meter data within mData21, which has control frameworks in place with measures to:</p> <ul style="list-style-type: none"> Ensure data held in mData21 is secured from unauthorised local or remote access by granting role based access at the Windows active directory level and two factor authentication, token, for remote access into the mData21 platform; Flag and investigate unauthorised attempts into the system through intrusion detection dashboards, monitoring unsuccessful attempts into the network; and Authenticate the interfacing between systems communicating with mData21 through encrypted channels and SFTP channels. <p>Through examination of Horizon Power IT Policy Documents and Password Policy Active Directory, we noted Horizon Power has strict guidelines and security controls in effect to ensure electronic passwords and other electronic security controls are only issued to the</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>specified authorised personnel and are secure from unauthorised access.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period. .</p>			
382	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	<p>Through enquiries with the Metering Services Manager and examination of mData21, it was noted MDR stores all the energy reads taken at 15 minute intervals from each of the advanced meters. It was observed that mData21 has the functionality to pull energy data from the MDR for both billing and reference purposes. There are zero archiving activities undertaken in any of the systems so no data is ever removed.</p> <p>As confirmed by the Metering Services Manager, Horizon Power continues to perform all metering services in-house during the audit period utilising mData21 as the metering database, where all data relating to each metering point on its network is maintained.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
383	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1 (1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	5	<p>Through enquiries with the Metering Services Manager, we noted there is currently an SLA under negotiation with another retailer, with negotiations taking place between the relevant parties. This is currently in draft, with completion expected in July 2020. The following was noted:</p> <ul style="list-style-type: none"> The request is being processed diligently and expeditiously; The SLA is being negotiated in good faith with the other retailer; and The SLA will detail the metering services the other retailer wishes to acquire. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
384	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: - expeditiously and diligently process all requests for a service level agreement; - negotiate in good faith with a Code participant regarding the terms for an agreement; and - to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	5	Through enquiries with the Metering Services Manager, we noted there is currently an SLA under negotiation with another retailer, with negotiations taking place between the relevant parties. This is currently in draft, with completion expected in July 2020. The following was noted: <ul style="list-style-type: none">The request is being processed diligently and expeditiously;The SLA is being negotiated in good faith with the other retailer; andThe SLA will detail the metering services the other retailer wishes to acquire. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
385	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.3	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	4	Through enquiries with the Metering Services Manager and examination of mData21, it was noted MDR stores all the energy reads taken at 15 minute intervals from each of the advanced meters. It was observed that mData21 has the functionality to pull energy data from the MDR for both billing and reference purposes. As confirmed by the Metering Services Manager, Horizon Power continues to perform all metering services in-house during the audit period utilising mData21 as the metering database, where all data relating to each metering point on its network is maintained. Testing performed around Horizon Power's mData21 metering database, meter reading processes and procedures confirmed that Horizon Power's processes and procedure allowed for energy data to be transferred within two business days after the scheduled read date for the metering point. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
386	Distribution Licence, condition 4.1.1 Integrated Regional	Electricity Industry Metering Code, clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12 month period undertake a meter reading that provides an actual	2	Through enquiries with the Metering Services Manager, review of relevant documentation and walkthroughs of the system, we noted Horizon Power's advanced meters (AMI) will automatically send reads into the MDR every six hours to with an actual value that passes the validation	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1 Transmission Licence, condition 4.1.1		value that passes the validation processes in Appendix 2.		<p>processes in Appendix 2 of the Code. The meters were tested upon implementation against the validation processes and confirmed that the population had passed.</p> <p>The data is uploaded into mData21 overnight, removing the need for a physical inspection to complete an actual read. A must read service order will be raised if there is an issue with the meter, resulting in no read being obtained. This is monitored by the Metering Services team, and when a failure is logged, an alert will be raised from mData21, requiring a Metering Services Data Engineer to raise a Service Order to those Horizon Power employees in the field. A physical read will be taken, and if required, the meter replaced.</p> <p>Sample testing was conducted over must read services orders completed for the period and noted the following:</p> <ul style="list-style-type: none"> Where an actual read had not been obtained in ten months, a must read service order was raised and actioned within 5 business days. The actions were closed in mData21, with comments left by the field technicians indicating the actions taken. <p>A recommendation was raised in the 2017 Performance Audit for Regional Managers to reinforce with staff the importance of following the annual read process and to arrange training as required for using existing monitoring and reporting mechanisms to track outstanding must read service order due dates against actual service order completion dates. It was noted by the RCM Esperance that this was resolved partly due to the roll-out of the new AMI meters, as well as reinforcing with contractors and field staff the importance of completing the service orders as requested. Review of the Special Read data confirmed Service Orders are actioned within an appropriate timeframe by field staff and contractors.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
387	Distribution Licence, condition 4.1.1 Integrated Regional Licence,	Electricity Industry Metering Code, clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is	2	Through enquiries with the Metering Services Manager, we noted all meters are now electronically read. They were tested for accuracy and functionality at the time of implementation and therefore reasonable to assume they are still reading automatically. The reads are sent to	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	condition 4.1.1 Transmission Licence, condition 4.1.1		suitably skilled in accordance with good electricity industry practice to carry out meter readings.		<p>mData21 every 15 minutes, which is then read by the Metering Services team at Horizon Power.</p> <p>Sample testing conducted noted the AMI meters are read automatically, with reads uploaded to mData21. This system is accessible by Horizon Power employees only, therefore they have been undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
389	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2)	<p>Subject to subclause 5.5(2A) (b), a network operator may impose a charge for the provision of data, but only if</p> <ul style="list-style-type: none"> - a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and - if a customer has given a direction under subclause 5.17A (1), in accordance with the prescribed conditions. 	4	<p>Through enquiries with the Metering Services Manager, and examination of documentation, we noted:</p> <ul style="list-style-type: none"> • Horizon Power's Metrology Procedure adequately identifies this obligation and aligns with 10.7 of the Code of Conduct (Supply of Electricity to Small Use Customers) 2018; • Horizon Power staff are required to obtain verifiable evidence of customer consent prior to providing data to a person requesting such data on behalf of that customer; and • In the instance where a person requested data on behalf of customers, appropriate consent was obtained from the customer prior to data being provided within the timeframes prescribed. The information was given to the nominated recipient via an excel document in a secure email. • Upon request, Horizon Power will provide customers, free of charge, all available energy data over the phone, through email or by post, regardless of the requested timeframe. Therefore, Horizon Power had not imposed a charge for the provision of data during the audit period. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
390	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2A)	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	<p>Through enquiries with the Metering Services Manager and examination of instances where standing data or energy data was provided, we noted:</p> <ul style="list-style-type: none"> Where a customer requests energy data or standing data from the customer service line, the request is resolved while on the phone with the customer; The customer service employee taking the call would contact the Meter Data Coordinator after confirming the identity of the customer, who would then compile the requested information; Checks are performed to ensure that information provided to a customer is only for the period of time for which the customer has been associated with the metering installation data is requested for; and All information is provided at no charge. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
391	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	4	<p>Through enquiries with the Metering Services Manager, we noted Horizon Power did not have any users accessing its networks during the audit period. It was confirmed that the IMO was replaced with the AEMO in June 2017, and they had not made any requests during the audit period.</p> <p>Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not received any requests from the AEMO during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
392	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	4	<p>Through enquiries with the Metering Services Manager, we noted Horizon Power did not have any users accessing its networks during the audit period. It was confirmed that the IMO was replaced with the AEMO in June 2017, and they had not made any requests during the audit period.</p> <p>Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not received any requests from the AEMO during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
393	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
394	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.9	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
395	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
397	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.12(1)	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
398	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.13	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must: - provide the current user with a complete current set of standing data for a metering point; and - advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
399	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
400	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.15	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	Through enquiries with the Metering Services Manager, we noted Horizon Power did not have any users accessing its networks during the audit period. It was confirmed that the IMO was replaced with the AEMO in June 2017, and they had not made any requests during the audit period. Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not received any requests from the AEMO nor did any users access the network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
403	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry Metering Code, clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A (2).	4	Through enquiries with the Metering Services Manager, and examination of documentation, we noted: <ul style="list-style-type: none"> Horizon Power's Metrology Procedure adequately identifies this obligation and aligns with 10.7 of the Code of Conduct (Supply of Electricity to Small Use Customers) 2018; Horizon Power staff are required to obtain verifiable evidence of customer consent prior to providing data 	N/A	B	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				<p>to a person requesting such data on behalf of that customer; and</p> <ul style="list-style-type: none"> In the instance where a person requested data on behalf of customers, appropriate consent was obtained from the customer prior to data being provided within the timeframes prescribed. The information was given to the nominated recipient via an excel document in a secure email. <p>Whilst we note that Horizon Power's Metrology Procedure is in place, there is currently no documented procedure to guide Horizon Power's staff in carrying out the obligation in accordance with subclause 5.17A(2) of the Electricity Industry Metering Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were generally adequate controls with improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
404	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A (1) within the timeframes prescribed.	4	<p>Through enquiries with the Metering Services Manager, and examination of documentation, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure adequately identifies this obligation and aligns with 10.7 of the Code of Conduct (Supply of Electricity to Small Use Customers) 2018; Horizon Power staff are required to obtain verifiable evidence of customer consent prior to providing data to a person requesting such data on behalf of that customer; and In the instance where a person requested data on behalf of customers, appropriate consent was obtained from the customer prior to data being provided within the timeframes prescribed in <i>Electricity Industry (Metering) Code clause 5.17A(3)</i>. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
409	Distribution Licence, condition 4.1.1 Integrated Regional Licence,	Electricity Industry Metering Code, clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes	4	<p>Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	condition 4.1.1 Transmission Licence, condition 4.1.1		from the user within the timeframes prescribed.					
411	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	4	Through review of relevant documentation and discussions held with the Metering Services Manager, we note that Horizon Power did not have in place a communication rules during this audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
412	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	Through review of relevant documentation and discussions held with the Metering Services Manager, we note that Horizon Power did not have in place a communication rules during this audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
413	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(4)	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: - subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and - inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed.	4	Through review of relevant documentation and discussions held with the Metering Services Manager, we note that Horizon Power did not have in place a communication rules and had not received a request from a Code participant for verification of energy data during this audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
414	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	4	Based on enquiries held with the Customer Services Process Manager, it was concluded that Horizon Power had not received a request to undertake either a test of audit as they acted as a vertically integrated entity and did not have any other code participants. Therefore, a control	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Transmission Licence, condition 4.1.1				assessment for this obligation was not performed and cannot be rated for compliance.			
415	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	4	Based on enquiries held with the Customer Services Process Manager, it was concluded that Horizon Power had not received a request to undertake either a test of audit as they acted as a vertically integrated entity and did not have any other code participants. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
418	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
419	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	4	Through enquiries with the Metering Services Manager, we noted there is currently an SLA under negotiation with another retailer, with negotiations taking place between the relevant parties. This is currently in draft, with completion expected in July 2020. Based on enquiries held with the Metering Services Manager, it was concluded that Horizon did not enter into a SLA during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
420	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(11)	If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must: - advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power did not have any users accessing their network during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
			- must restore the accuracy of the metering installation in accordance with the applicable service level agreement. ¹¹ Footnote: ¹¹ Clause 5.21(11)(c) gives the network operator an option to make corrections to the energy data for a period up to 12 months before the date of the test or audit.					
421	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not had any users accessing its networks during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
422	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power's Metrology Procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the Metering Code 2012. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the Metering Code 2012 and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
423	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the Metering Code 2012. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the Metering Code 2012 and applicable metrology procedure. <p>Enquiries with the Metering Services Manager determined the obligation relates specifically to validating data for upload to a retailer for the customer installations. These meters are never uploaded to a retailer as they are large energy contracts.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
424	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>rules and procedure set out in Appendix 3 of the Metering Code 2012.</p> <ul style="list-style-type: none"> mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the Metering Code 2012 and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
425	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	<p>Through enquiries with the Metering Services Manager it was determined that:</p> <ul style="list-style-type: none"> The note associated with the definitions of 'network operator', 'retailer', and 'generator' states that under Clause 1.2, their respective definitions only apply to certain network operators / retailers / generators, not all. Clause 1.2 states that the code applies to a network operator (Horizon Power) only to the extent that a condition of a licence requires it to do so. Therefore, obligations referring to 'code participants' is assessed as only applying to Code Participants who are related to the network associated with Horizon Power's licence. There were no relevant code participants falling under the definition of Clause 1.2 (a)(b)(d)(e). It was confirmed by the Retail Services Manager that licensed generators connected to Horizon Power's network had not been affected by a loss of energy data or incorrect energy data from a metering installation. It was confirmed by the Metering Services Manager that the IMO and the Authority would not be considered an 'affected' code participant in the event Horizon Power detected a loss of energy data or incorrect energy data from a metering installation. 	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries held with Metering Services Manager, it was concluded that Horizon Power did not have affected code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
426	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the Metering Code 2012. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the Metering Code 2012 and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
427	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>actual reading has not been obtained, or the actual reading has failed validation.</p> <ul style="list-style-type: none"> Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the <i>Code</i>. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the <i>Code</i> and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
428	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the <i>Code</i>. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the <i>Code</i> and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
429	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must: - repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and - subclauses 5.24(3)(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure, and understanding of automatic controls used to validate, estimate and substitute reads through mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metrology procedure aligns with the requirements of this obligation and the prescribed rules and procedure set out in Appendix 3 of the <i>Code</i>. In instances where Horizon Power has designated a 'deemed actual value' for a metering point, Horizon Power has repaired or replaced meters at the metering point. mData21 automatically validates, estimates, and substitute's energy data in accordance with the rules and formulae outlined in the <i>Code</i> and applicable metrology procedure. In instances where substituted energy data reads were applied Horizon Power had correctly and adequately investigated reads which failed validation prior to substituting reads. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
430	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so	4	<p>Through enquiries with Metering Services Manager, we noted:</p> <ul style="list-style-type: none"> mdata21 is a metering data management system that has been developed based on the rules for substitution, estimate and validation according to the metering code and the WEM. 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Transmission Licence, condition 4.1.1		would be consistent with good electricity industry practice.		<ul style="list-style-type: none"> There were no known instances occurring where Horizon Power would or could have obtained a better quality second actual value, or deemed actual value, to replace a first actual value, or deemed actual value. Where a better quality actual, deemed actual, estimated or substituted value is available, this would replace an estimated or substituted first value through mData21's automatic processes. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
431	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	<p>Through enquiries with Metering Services Manager, we noted:</p> <ul style="list-style-type: none"> mdata21 is a metering data management system that has been developed based on the rules for substitution, estimate and validation according to the metering code and the WEM. There were no known instances occurring where Horizon Power would or could have obtained a better quality second actual value, or deemed actual value, to replace a first actual value, or deemed actual value. Where a better quality actual, deemed actual, estimated or substituted value is available, this would replace an estimated or substituted first value through mData21's automatic processes. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>	N/A	A	NR
432	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry Metering Code, clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with	4	<p>Through enquiries with Metering Services Manager, we noted:</p> <ul style="list-style-type: none"> mdata21 is a metering data management system that has been developed based on the rules for substitution, estimate and validation according to the metering code and the WEM. There were no known instances occurring where Horizon Power would or could have obtained a 	N/A	A	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1		good electricity industry practice or the user and its customer jointly request it to do so.		<p>better quality second actual value, or deemed actual value, to replace a first actual value, or deemed actual value. Where a better quality actual, deemed actual, estimated or substituted value is available, this would replace an estimated or substituted first value through mData21's automatic processes.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, however no relevant activity occurred during the audit period, therefore the obligation is not rated.</p>			
433	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	Based on enquiries held with the Metering Services Manager, it was concluded that Horizon Power had not had any other network operators, retailers, generators, metering data agents or users on Horizon Power's networks with the capacity to make such a request during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
434	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	4	<p>Through enquiries with the Metering Services Manager, examination of Horizon Power's Metrology Procedure and walkthrough of mData21, we noted:</p> <ul style="list-style-type: none"> Horizon Power performs all management and maintenance of meters in-house. Horizon Power substitutes, estimates or validates energy data in accordance with the Metrology Procedures where an actual reading has not been obtained, or the actual reading has failed validation. Horizon Power's metering database mData21 operates within its Metrology Procedure, which outlines validation requirements at section 3.4. The section outlines that if a validation fails prescribed testing (at Schedule 8) the data is to be estimated. The rules for estimation are outlined in the Metrology Procedure and appear to be consistent with good electricity industry practice. mdata21 is a metering data management system that has been developed based on the rules for 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					substitution, estimate and validation according to the metering code and the WEM. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
447	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 5.1	Electricity Industry Metering Code, clause 6.1(1)	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	2	<p>Through enquiries with the Metering Services Manager and review of relevant documentation, we noted the following in regard to this obligation:</p> <ul style="list-style-type: none"> Model Service Level Agreement - Horizon Power is in the process of drafting communication rules and a model service level agreement. As these have not yet been finalised, they were not considered assessable for this performance audit. Communication Rules - Horizon Power is in the process of drafting communication rules and a model service level agreement. As these have not yet been finalised, they were not considered assessable for this performance audit. Metrology Procedure - The Metrology Procedure and Mandatory Link Criteria was developed in alignment with the Electricity Industry (Metering) Code, and this is stated in clause 1.2.1 of the procedure and came into effect on 3 January 2018, with a draft submitted to the Authority for review on 10 April 2017. Amendments by the Authority were issued in June 2017. For the interim period, Horizon Power adopted a draft of the 2006 Metrology Procedure as its metrology standard. The procedure was reviewed and amended by Horizon Power in alignment with Metering Code 2012 to include additional requirements and clarifications as well as specific reference to AMI and its components. See Obligation 319 for full detail of the previous Metrology Procedure. Service Level Agreement (SLA) - During this audit period, the State Government has passed legislation for the Horizon Power and Alinta Pilbara Networks to become a market and as such HP has been following the Code and other obligations in establishing its SLA. However, as it is in draft, the SLA is not assessable for this audit period. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Mandatory Link Criteria - Horizon Power has an approved Mandatory Link Criteria as of January 2018. A draft was submitted to the Authority for review on 10 April 2017. See issue at Obligation 319 for detail of the previous Mandatory Link Criteria submission which was applicable for a portion of this audit period. Registration Process - Horizon Power does not have a registration process in place, and therefore is not assessable for this audit period. <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
448A	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.2	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	5	<p>Through review of relevant documentation and discussions with the Metering Services Manager, we noted Horizon Power had the following established under the previous Electricity Industry (Metering) Code 2005:</p> <ul style="list-style-type: none"> Metrology Procedure 2006 Mandatory Link Criteria <p>The above documents continue in effect under the current Electricity Industry (Metering) Code 2012, as stated in the Code that <i>"All documents which were in effect under the 2005 Metering Code immediately before its repeal by clause 10.1, continue in effect for the purposes of this Code in accordance with section 36 of the Interpretation Act 1984."</i></p> <p>A model service level agreement (SLA) was not required during this audit period as Horizon power did not have any "users" on their network. During this audit period, the State Government has passed legislation for the Horizon Power and Alinta Pilbara Networks to become a market and as such Horizon Power has been following the Code and other obligations in establishing its SLA. This SLA is currently in draft and due to be submitted by 30 June 2020, which is outside this audit period.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
448B	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1) (a) (i), 6.16 or 6.17.	5	<p>Through review of relevant documentation and discussions with the Metering Services Manager, we noted Horizon Power had the following documents amended during the audit period:</p> <ul style="list-style-type: none"> • Metrology Procedure • Mandatory Link Criteria <p>Approval was given by the Authority on the 19th of December 2017, with publication by Horizon Power to occur prior to 5 January 2018, taking into account the public holidays over the Christmas period. The documents were published by Horizon Power on 3 January 2018.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
448C	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.19A(1)	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	5	<p>Through review of relevant documentation and discussions with the Metering Services Manager, we noted communication rules were not required during this audit period as Horizon Power did not have any "users" on their network. During this audit period, the State Government has passed legislation for the Horizon Power and Alinta Pilbara Networks to become a market and as such Horizon Power has been following the Code and other obligations in establishing the communication rules. The Communication Rules are currently in draft and are expected to be approved in July 2020.</p> <p>Based on enquiries held with the Metering Services Manager and review of documentation, it was concluded that Horizon Power did not have any users during the audit period, resulting in communication rules not being required. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
448D	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry Metering Code, clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1) (k) or clause 6.19C.	5	<p>Through review of relevant documentation and discussions with the Metering Services Manager, we noted communication rules were not required during this audit period as Horizon Power did not have any "users" on their network. During this audit period, the State Government has passed legislation for the Horizon Power and Alinta Pilbara Networks to become a market and as such Horizon Power has been following the Code and other obligations in establishing the communication rules.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				Based on enquiries held with the Metering Services Manager and review of documentation, it was concluded that Horizon Power did not have any users during the audit period, resulting in communication rules not being required. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
449	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	5	Through review of relevant documentation and discussions with the Metering Services Manager, we noted the Metrology Procedure and Mandatory Link Criteria were submitted to the ERA for review on 12 April 2017. Amendments were subsequently made and submitted to the ERA on 24 July 2017 and 4 September 2017 respectively. The ERA presented their draft findings on both documents on 14 November 2017, with final approval given on 19 December 2017. Through review of these documents, we noted amendments were made by Horizon Power in accordance with the ERA's final findings. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
450	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	4	Through review of relevant documentation and discussions with the Metering Services Manager, we noted the Metrology Procedure and Mandatory Link Criteria were submitted to the ERA for review on 12 April 2017. Amendments were subsequently made and submitted to the ERA on 24 July 2017 and 4 September 2017 respectively. The ERA presented their draft findings on both documents on 14 November 2017, with final approval given on 19 December 2017. The documents were published on the Horizon Power website on the 3 rd of January 2018. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
452	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 7.2(2)	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	Through enquiries with the Manager Customer Service, we noted Horizon Power are aware of the obligation to notify Code participants of change in contact details should it occur. However, Horizon Power has not made any changes to its contact details during the audit period.	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Transmission Licence, condition 4.1.1				Based on enquiries held with the Manager Customer Service, it was concluded that Horizon Power had not updated its contact details during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
457	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(1)	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.	5	<p>Through enquiries with the Retail Services Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, and another: retailer; generator; metering data agent; user; or the IMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. It was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; It was confirmed by the Retail Services Manager that there were no disputes made between a licensed generator or the IMO and Horizon Power during the audit period; <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not had a dispute with any other Code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
458	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(2)	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.	5	<p>Through enquiries with the Retail Services Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, and another: retailer; generator; metering data agent; user; or the IMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. It was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; It was confirmed by the Retail Services Manager that there were no disputes made between a licensed generator or the IMO and Horizon Power during the audit period; 	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not had a dispute with any other Code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
459	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(3)	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.	5	<p>Through enquiries with the Retail Services Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, and another: retailer; generator; metering data agent; user; or the IMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. It was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; It was confirmed by the Retail Services Manager that there were no disputes made between a licensed generator or the IMO and Horizon Power during the audit period; <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not had a dispute with any other Code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
460	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.1(4)	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.	4	<p>Through enquiries with the Retail Services Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, and another: retailer; generator; metering data agent; user; or the IMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. It was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; It was confirmed by the Retail Services Manager that there were no disputes made between a licensed generator or the IMO and Horizon Power during the audit period; 	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not had a dispute with any other Code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
461	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	5	<p>Through enquiries with the Retail Services Manager, we noted for the purpose of the Metering Code, “disputes” refers to metering disputes between Horizon Power as the network operator, and another: retailer; generator; metering data agent; user; or the IMO, the subject matter of which is not also an access dispute under the Access Code, a dispute under the market rules, a dispute or a complaint under the Code of Conduct, or a dispute under the Customer Transfer Code. It was determined that:</p> <ul style="list-style-type: none"> There were no other relevant network operators, retailers, metering data agents or users on Horizon Power’s networks during the audit period; It was confirmed by the Retail Services Manager that there were no disputes made between a licensed generator or the IMO and Horizon Power during the audit period; <p>Based on enquiries held with the Retail Services Manager, it was concluded that Horizon Power had not had a dispute with any other Code participants during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.</p>	N/A	NP	NR
462	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer’s electrical installations complies with prescribed standards.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power’s Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power’s Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility.</p> <ul style="list-style-type: none"> Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
463	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas.</p> <ul style="list-style-type: none"> Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
464	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
465	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas.</p> <ul style="list-style-type: none"> Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
466	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. <ul style="list-style-type: none"> These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
467	Distribution Licence, condition 4.1.1 Integrated	Electricity Industry (Network Quality and Reliability of	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	4	Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Regional Licence, condition 4.1.1	Supply) Code, clause 12(3)			<p>handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, 			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction.</p> <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
468	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments. The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power's Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative arrangement is entered into with the customer, to the customer's satisfaction. <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
469	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	4	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of Horizon Power's Asset Management Strategy, Technical Rules handbook, Asset Management Reports, Power Quality Investigation handbook and Asset Performance Report, we noted the following observations:</p> <ul style="list-style-type: none"> Horizon Power's Technical Rules document sets out the required performance standards for the service quality in relation to the network, including the 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>technical requirements for the design or operation of equipment connected to the transmission and distribution systems. The Technical Rules established are consistent with good electricity industry practice, relevant laws and statutory instruments.</p> <ul style="list-style-type: none"> The Technical Rules includes power system performance standards covering flickers, voltage fluctuations, harmonic distortion and connection of large distorting loads as defined in AS/NZS 61000.2001 for electromagnetic compatibility. Supply interruptions to customers are monitored and recorded for internal analysis and also used to calculate: <ul style="list-style-type: none"> CAIDI – measures the duration of a power outage a customer is expected to have; SAIDI – measures the total number of minutes a customer is expected to have no power over a 12 month period; and SAIFI – measures the total number of outages a customer is expected to experience over the 12 month period. These indices are reported annually in the performance report on NQRS. Electricity supply is disconnected from customer premises if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or the potential to damage assets. Horizon Power has monthly asset management reports which records and reports instances where the average length of interruption is greater than 160 minutes for urban areas other than Perth CBD or greater than 290 minutes for non-urban areas. Horizon Power’s Asset Management Strategy and Systems document outlines the strategies in place to mitigate the effect of interruption on customers, including using options analysis to assess alternative means of providing power, such as batteries and generators. Interruption of electricity supply incidents are investigated and remedied, or an alternative 			

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>arrangement is entered into with the customer, to the customer's satisfaction.</p> <p>An independent audit in respect of the operation of its compliance monitoring systems was undertaken by Qualeng. The report concluded that Horizon Power satisfied the requirements of Part 2 of the NQRS Code.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
470	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	Based on enquiries held with the Customer Services Process Manager, it was concluded that Horizon Power had not been issued an instrument by the Minister during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
471	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	Based on enquiries held with the Customer Services Process Manager, it was concluded that no provisions of the Electricity Industry (Network Quality and Reliability of Supply) Code had been excluded or modified, and thereby Horizon Power had not been obliged to set out the advantages and disadvantages to the customer of doing so in their agreement during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
472	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	4	Through enquiries with the Customer Services Process Manager, we noted Horizon Power has procedures in place to make payments to customers in specific time frames, should they not provide at least 72 hours' notice prior to a planned interruption. The Horizon Power Extended Outage Payment Scheme Process outlines the eligibility criteria and steps necessary to process customer applications for reliability payments. CSRs will validate claims made against system recorded outages/faults at the supply address through Webview. If a claim is validated, payments are credited directly to a customer's account to ensure that the 30 day timeframe is met, and subsequently a customer can request a refund via EFT.	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
473	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	2	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power has processes and policies in place to ensure that payments are made to a customer within the specified time frame if a supply interruption exceeds 12 hours. Walkthrough of Horizon Power's process determined that customers are able to submit a claim online via the Horizon Power website, or by submitting a hardcopy claim form. Once applications are received, Horizon Power will advise the relevant depot to investigate the details of the outage in question and assess whether it exceeded 12 hours. Once the depot confirms the claim, Horizon Power automatically credits the customer's account. The customer may then request a refund via EFT, or leave their account in credit.</p> <p>Sample based testing was conducted over claims made during the audit period and we determined that Horizon Power processed supply interruption payment amounts of \$80 within 30 days of the application being made.</p> <p>Based on enquiries, examination of documentation, walkthroughs, and sample testing, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
474	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19. Horizon Power provides customers with the required information through the Horizon Power website, and through the Customer Charter.</p> <p>Examination of Horizon Power Horizon Power's Website, and the Customer Charter determined that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> • Payment for failure to give the required notice of a planned interruption; • Payment for supply interruptions exceeding twelve hours; • How the application can be made; and 	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<ul style="list-style-type: none"> The manner in which the application will be dealt with by Horizon Power <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
475	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(2)	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	<p>Through enquiries with the Customer Services Process Manager we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19. Horizon Power provides customers with the required information through the Horizon Power website, under the Make a Claim section, and through the Customer Charter, which is issued to customers upon registering a new account with Horizon Power.</p> <p>Examination of Horizon Power Horizon Power's Website, and the Customer Charter determined that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> Payment for failure to give the required notice of a planned interruption; Payment for supply interruptions exceeding 12 hours; How the application can be made; and The manner in which the application will be dealt with by Horizon Power. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
476	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	4	<p>Through enquiries with the Customer Services Process Manager, we noted Horizon Power has controls in place to ensure customers are provided with the required information under the Electricity Industry (Network Quality and Reliability of Supply) code 2005, sections 18 and 19 at least once a year. The relevant information is provided to customers by way of an 'On the Horizon' newsletter which is posted to customer's address every two months. We also noted that Horizon Power provides customers with the required information through the Horizon Power website, under the Make a Claim section, and through the Customer Charter.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Examination of Horizon Power's 'On the Horizon' newsletter, Website, and the Customer Charter determined that Horizon Power includes the following information as required:</p> <ul style="list-style-type: none"> • Payment for failure to give the required notice of a planned interruption; • Payment for supply interruptions exceeding 12 hours; • How the application can be made; and • The manner in which the application will be dealt with by Horizon Power. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
477	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	5	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of network monitoring documentation, we noted Horizon Power has extensive monitoring controls to ensure compliance with quality and reliability standards and performance reporting.</p> <p>Walkthrough of SCADA noted that Horizon Power's SCADA systems are present at all Horizon Power locations, including main sites or depots, sub stations, power stations and repeater sites. Network monitoring through SCADA systems are outsourced to Calibre Global Pty Ltd and governed through a Service Level Agreement with Horizon Power. Network monitoring and support services of Horizon Power's network are provided 24 hours a day, seven days a week.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
478	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of CS16, we noted NQRS data is stored in the system indefinitely, which is compliant with the monitoring and record keeping retention period of five years set out in the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 23(2).</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1				improvement needed, and Horizon Power has complied with the obligation during the audit period.			
479	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	<p>Through enquiries with the Manager Asset Services and review of relevant documentation, we noted Horizon Power has processes and procedures in place to perform power quality investigations, detailed in the Power Quality Investigation Handbook. The code sets out investigation must be complete within 20 working days and results of the investigation must be reported to the customer concerned. Review of Power Quality Investigation handbook confirmed Horizon Power are in line with these requirements. The Asset Management Reports include detail of providing compliance.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
480	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	<p>Through enquiries with the Manager Asset Services and review of relevant documentation, we noted Horizon Power has processes and procedures in place to perform power quality investigations, detailed in the Power Quality Investigation Handbook. Table 5.4.1 of the Power Quality Investigation Handbook noted:</p> <ul style="list-style-type: none"> In the instance an investigation finds there to be a network fault, the 'Regional Customer Relations contacts the Customer to explain power quality investigation status and proposed course of action. The customer will also be advised of their responsibilities (e.g. access to property) with regards to this investigation.' In the instance an investigation finds there to be no network fault, the 'Regional Customer Relations advises the Customer verbally and in writing that a full investigation has been carried out but has failed to identify any faults with Horizon Power equipment. Horizon Power has therefore met all its statutory requirements with regards to the power quality issue'. <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
481	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(2)	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will direct customers who are seeking information that will assist them in utilising the complaints handling process to the Horizon Power website or the Customer Charter. The Horizon Power website and the Customer Charter are available to all customers at no charge. Additionally, a suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process. Training is monitored and tracked in a spreadsheet which is updated and reviewed on a monthly basis.</p> <p>Examination of Horizon Power Customer Charter and website noted that it provides information regarding Horizon Power's complaints handling processes.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
482	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will direct customers who are seeking information that will assist them in utilising the complaints handling process to the Horizon Power website or the Customer Charter. The Horizon Power website and the Customer Charter are available to all customers at no charge. All publicly available documents are reviewed by Retail Services and Legal team prior to release. Additionally, a suite of training modules is offered to Horizon Power employees. Included in this suite of training is a module on the complaints process.</p> <p>Examination of Horizon Power Customer Charter and website noted that it provides information regarding Horizon Power's complaints handling processes as well as the right for small use customers to contact the Energy Ombudsman.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
483	Distribution Licence, condition 4.1.1 Integrated Regional	Electricity Industry (Network Quality and Reliability of Supply) Code,	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out	4	Under the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. Horizon Power	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	clauses 26(1) and (2)	in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.		engaged Qualeng to undertake an independent audit in respect of the operation of its compliance monitoring systems for the audit period. This was last undertaken in September 2017. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
483A	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	4	Under the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. Horizon Power engaged Qualeng to undertake an independent audit in respect of the operation of its compliance monitoring systems for the audit period. This was last undertaken in September 2017. Examination of Horizon Power's website and email correspondence between the Asset Manager Support team and the Communications team, noted that Horizon Power's NQRS Independent Performance Report was published on Horizon Power's website on 26 September 2017. Examination of the email trail from Horizon Power to the Minister and the ERA, noted that the 2017 NQRS Independent Performance Report were provided to the Minister and the ERA on 14 September 2017. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
483B	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	4	Under the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26, Horizon Power is required to arrange for an independent audit of the operation of the systems that are in place to monitor its compliance with Part 2 of the Code. Horizon Power engaged Qualeng to undertake an independent audit in respect of the operation of its compliance monitoring systems for the audit period. This was last undertaken in September 2017 and was submitted to the Minister not less than seven days before it was published. Examination of Horizon Power's website and email correspondence between the Asset Manager Support team and the Communications team, noted that Horizon	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					<p>Power's 2017 NQRS Independent Performance Report was published on Horizon Power's website on 26 September 2017.</p> <p>Examination of the email trail from Horizon Power to the Minister and the ERA, noted that the 2017 NQRS Independent Performance Report were provided to the Minister and the ERA on 14 September 2017 and published on Horizon Power's website on 26 September 2017.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>			
484	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	4	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of the 2017 & 2019 NQRS Performance Reports noted that the reports were prepared in accordance with the requirements under the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(1). The reports cover:</p> <ul style="list-style-type: none"> • Non-compliances with the Code; • Number of small use customer supply interruptions; • Number of complaints; • Amount spent in addressing complaints; • Payments for failure to give required notice of planned interruption; • Payments for supply interruptions exceeding 12 hours; • Length of interruption of supply to customer premises; and • Major event days. <p>Examination of Horizon Power's website and email correspondence between the Asset Management Support team and the Communications team, noted that the NQRS Performance Reports were published on Horizon Power's website on 1 October 2019.</p> <p>Examination of the email trail from Horizon Power to the Minister and the ERA, noted that the 2019 NQRS Performance Reports were provided to the Minister and the ERA on 20 September 2019.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no</p>	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
					improvement needed, and Horizon Power has complied with the obligation during the audit period.			
485	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	4	<p>Through enquiries with the Manager Asset Services, supplemented with an examination of the 2017 & 2019 NQRS Performance Reports noted that the reports were prepared in accordance with the requirements under the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(1). The reports cover:</p> <ul style="list-style-type: none"> • Non-compliances with the Code; • Number of small use customer supply interruptions; • Number of complaints; • Amount spent in addressing complaints; • Payments for failure to give required notice of planned interruption; • Payments for supply interruptions exceeding 12 hours; • Length of interruption of supply to customer premises; and • Major event days. <p>Examination of Horizon Power's website and email correspondence between the Asset Management Support team and the Communications team, noted that the NQRS Performance Reports were published on Horizon Power's website on 1 October 2019.</p> <p>Examination of the email trail from Horizon Power to the Minister and the ERA, noted that the 2019 NQRS Performance Reports were provided to the Minister and the ERA on 20 September 2019.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1
486	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.1 Synergy Retail Licence,	Electricity Industry (Licence Conditions) Regulations, regulation 8	The licensee must submit to the Coordinator a draft renewable source electricity contract by the time specified in the Act or by the Coordinator.	4	<p>Through enquiries with the Manager Customer Service, we noted Horizon Power had not submitted a draft renewable source contract to the Coordinator during the audit period. The latest submission of the draft renewable contract was made to the Coordinator in 2015 which was managed by the Horizon Power Finance team. Horizon Power's current renewable contract is available on their website at no cost.</p>	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Schedule 1, condition 2.1				Based on enquiries held with the Manager Customer Service, it was concluded that Horizon Power had not submitted a draft renewable source contract to the Coordinator during the audit period. Therefore a control assessment for this obligation was not performed and cannot be rated for compliance.			
487	Horizon Power Integrated Regional Licence, Schedule 1, condition 2.6 Synergy Retail Licence, Schedule 1, condition 2.6	Electricity Industry (Licence Conditions) Regulations, regulation 8	The licensee must comply with a direction by the Coordinator to submit an amendment to the renewable source electricity contract by the time specified.	4	Through enquiries with the Manager Customer Service, we noted Horizon Power was not directed by the Coordinator to submit an amendment to the draft renewable contract during the audit period. The latest amendment made to the renewable contract was made in 2015 which was managed by the Horizon Power Finance team. Horizon Power's current renewable contract is available on their website at no cost. Based on enquiries held with the Manager Customer Service, it was concluded that Horizon Power was not directed by the Coordinator to submit an amendment to the renewable source electricity contract during the audit period. Therefore a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
488	Horizon Power Integrated Regional Licence, Schedule 1, conditions 3.1 and 3.2 Synergy Retail Licence, Schedule 1, conditions 3.1 and 3.2	Electricity Industry (Licence Conditions) Regulations, regulation 6	The licensee must offer to purchase renewable source electricity from a renewable source electricity customer under an approved renewable source electricity contract.	4	Through enquiries with the Retail Services Manager, we noted Horizon Power offer to purchase a customer's excess renewable energy that has been exported into the electricity system. During the move-in process, Velocity will automatically identify customers eligible for the buyback offer and customers are asked if they agree to terms and conditions over the phone. Additionally, Velocity provides CSRs call scripts on offering to purchase electricity from a customer. Information on the 'REBS' can be found on Horizon Power's website and is sent to eligible customers as part of their acknowledgement email and welcome letter. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.	N/A	A	1
489	Horizon Power Integrated Regional Licence, Schedule 1, condition 3.3 Synergy Retail	Electricity Industry (Licence Conditions) Regulations, regulation 7	The licensee must submit to the Coordinator a written report detailing the amount of renewable source electricity purchased by the licensee and the cost of purchasing that renewable source electricity as soon	4	Through enquiries with the Customer Services Process Manager, we noted Horizon Power's Customer Officer submits a Renewable Source Electricity Report on a monthly basis via email. The annual required renewable source electricity report is subsequently generated at the end of the Financial Year and submitted by the Customer Officer.	N/A	A	1

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, Schedule 1, condition 3.3		as practicable at the end of each financial year.		Examination of the 2018-19 Renewable source electricity report to the Coordinator of Energy noted that the Renewable Source Electricity Report was submitted on the 12 th of August 2019, and therefore within a reasonable time frame. Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.			
490	Horizon Power Integrated Regional Licence, Schedule 1, condition 4.1 Western Power Transmission Licence, Schedule 1, condition 2.1 Western Power Distribution Licence, Schedule 1, condition 2.1	Electricity Industry Act, sections 61 and 65	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	4	Based on enquiries held with Manager Asset Services, it was concluded that Horizon Power had not been requested to submit a draft extension and expansion policy during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
491	Horizon Power Integrated Regional Licence, Schedule 1, condition 4.2 Western Power Transmission Licence, Schedule 1, condition 2.2 Western Power Distribution Licence, Schedule 1, condition 2.2	Electricity Industry Act, sections 62, 64 and 65	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy.	4	Based on enquiries held with Manager Asset Services, it was concluded that Horizon Power had not been requested to submit a draft extension and expansion policy during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.	N/A	NP	NR
492	Horizon Power Integrated Regional	Electricity Industry Act, sections 65	The licensee must implement arrangements set out in an approved extension and expansion policy.	4	Based on enquiries held with Manager Asset Services, it was concluded that Horizon Power had not been requested to submit a draft extension and expansion	N/A	NP	NR

Ref. No.	Licence Condition	Licence Obligation	Description	Audit priority	Observation	Recommendation	Control Rating	Compliance Rating
	Licence, Schedule 1, condition 4.3 Western Power Transmission Licence, Schedule 1, condition 2.3 Western Power Distribution Licence, Schedule 1, condition 2.3				policy during the audit period. Therefore, a control assessment for this obligation was not performed and cannot be rated for compliance.			
496	Horizon Power Integrated Regional Licence, condition 4.1.1 Synergy Retail Licence, condition 4.1.1	Electricity Industry (Customer Contracts) Regulations, regulation 40	Subject to specified exceptions, the licensee must offer to supply electricity under a standard form contract to a customer who requests it.	4	<p>Through enquiries with the Retail Services Manager, we noted Horizon Power will offer to supply under a SFC to any customer that requests it, providing the premises is connected to a distribution system. If eligible, customers are also offered the ability to enter into a NSC under the MyPower plan agreement. All NSC are entered into under an opt-in opt-out agreement and as per the non-standard call scripts, marketing agents are required to advise customers that they may revert back to the SFC at any time. Customers are able to obtain a copy of the Horizon Power's SFC on the Horizon Power website. The SFC includes Horizon Power's offer to supply electricity.</p> <p>Based on enquiries and examination of documentation, it was concluded that there were adequate controls with no improvement needed, and Horizon Power has complied with the obligation during the audit period.</p>	N/A	A	1

Appendix 1

Licensee's representatives who participated in the audit

The table below outlines key personnel who were involved in discussions and contributed to the findings detailed in this Audit Report.

#	Name	Title
1	Liang Tay	Risk & Audit Manager
2	Prachi Goel	Risk & Audit Specialist
3	Geoff White	Manager Customer Service
4	Jeff Campbell	IT Security Risk & Governance Specialist
5	John Dobson	Retail Services Manager
6	Janet Tranthim-Fryer	Customer Service Process Manager
7	Stephanie Bonfiglio	Senior Customer Service Officer
8	Paul Beattie	Senior Customer Service Officer
9	Greg Will	Metering Services Manager
10	Alistair Trolove	Manager Sustainability
11	Tara Stigwood	Retail & Community Manager - Kununurra
12	Noeleen McCann	Retail & Community Manager – Port Hedland
13	Andrew Cash	Senior Legal Counsel
14	Martin Shenker	Senior Legal Counsel
15	Kayla Schembri	Paralegal
16	Sam Sinclair	Pre-payment Metering Administrator
17	Mark Herbert	Manager Asset Services
18	Lance Roberts	Manager Safety & Wellbeing
19	Gerard Chow	Asset Systems Manager
20	Bill Bignell	Senior Assets Framework Engineer
21	Karlina Parera	Accounts Payable Officer
22	Donna Gibson	Retail & Community Manager - Esperance
23	Ben Walker	Retail Systems Analyst
24	Deepti Raval	Metering Communications System Engineer
25	Patrice Domingue	Financial Accounting Manager
26	Abbi Manjire	Manager Network Capacity Services

Appendix 2

Key Documentation and information sources

The table below outlines all documents used in this Audit Report.

#	Name
1	Electricity Compliance Reporting Manual July 2016
2	Electricity Compliance Reporting Manual July 2017
3	Electricity Compliance Reporting Manual July 2018
4	Electricity Industry (Customer Transfer) Code 2016
5	Electricity Industry (Obligation to Connect) Regulations 2005
6	Electricity Industry (Licence Conditions) Regulations 2005
7	Electricity Industry (Customer Contracts) Regulations 2005
8	Electricity Industry (Code of Conduct) Regulations 2005
9	Electricity Industry (Ombudsman Scheme) Regulations 2005
10	Electricity Industry (Metering) Code 2012
11	Electricity Industry Act 2004
12	Electricity Integrated Regional Licence EIRL2 (Horizon Power)
13	Code of Conduct for the Supply of Electricity to Small Use Customers 2016
14	Code of Conduct for the Supply of Electricity to Small Use Customers 2018
15	Economic Regulation Authority (Licensing Funding) Regulations 2014
16	Electricity Industry (Network Quality and Reliability of Supply) Code 2005
17	Electricity Retail Licence Performance Reporting Handbook 2019
18	Electricity Distribution Licence Performance Reporting Handbook 2019
19	Access Control Guidelines
20	Password Policy Active Directory
21	Infosec Incident Monitoring Dashboard
22	Financial Hardship Data Table
23	2020 Electricity Licence Reporting Datasheets Distribution
24	2016/2017 Horizon Power Performance Reporting Datasheets
25	2017/2018 Horizon Power Performance Reporting Datasheets
26	2017/2018 Horizon Power Annual Compliance Report
27	2018/2019 Horizon Power Annual Compliance Report
28	Horizon Power 2016/2017 Financial Report
29	Horizon Power 2017/2018 Financial Report
30	Horizon Power 2018/2019 Financial Report
31	EWOWA Annual Report 2018/19
32	Guideline Easements, Restrictive Covenants and Powers to Access Land June 2015

33	Draft Horizon Power Communications Rules
34	Horizon Power's Breach Register
35	ERA 2018 Electricity Retail Licence Performance Reporting Datasheets
36	ERA 2019 Electricity Retail Licence Performance Reporting Datasheets
37	Horizon Power Electricity Tariffs and Charges Brochure
38	Horizon Power Service Area Map
39	Horizon Power Rebate Information Sheet
40	Horizon Power Standard Form Contract
41	Horizon Power Recharge Operator List
42	Pattern Approval 14-2-38 EDM I Model Mk10E
43	Pattern Approval 14-2-30A EDM I Model Mk7C
44	Pattern Approval 14-2-64 Landis+Gyr Model E5400 Class 0.5
45	Pattern approval 14-2-78 Landis+Gyr Model E350 Type U3400 Class 1
46	Pattern Approval 14-2-63 Landis+Gyr Model E5300 Class 0.5
47	Pattern Approval 14-2-54 Landis+Gyr Model E350 U1300 Class 1
48	Pattern approval 14-2-48 Landis+Gyr Model E350 Type U3300 Class 1
49	Licence to use metering software
50	ERA Report on amendments to Metrology Procedure June 2017
51	Draft Findings on the Review of Horizon Power's Metrology Procedure
52	Draft Findings on the Review of Horizon Power's Mandatory Link Criteria
53	Horizon Power Report on amendments to Mandatory Link Criteria August 2017
54	Approved Horizon Power Mandatory Link Criteria 2005
55	Horizon Metrology Procedure 2017
56	2015 Horizon Power Audit Report and Post-Audit Implementation Plan
57	Regulatory framework for the Pilbara Electricity Reforms Design Report
58	Horizon Power Metrology Procedure 2006
59	Western Australian Distribution Connections Manual 2015
60	Meter Test Process Map
61	Meter Test Master Spreadsheet
62	Horizon Power Mandatory Link Criteria 2017
63	Computershare Service Level Agreement
64	ERA Customer Complaint Guidelines – December 2016
65	Ombudsman Complaints Report
66	Horizon Power Complaints Overview
67	HUGS Guidelines February 2020
68	New Connection Application Form
69	AS.NZS 10002.2014
70	New Connections Overview
71	Horizon Power Code of Conduct
72	Horizon Power Customer Charter
73	Financial Hardship Process Map
74	Financial Hardship Procedure
75	Terms and Conditions for MyPower for Small Use Customers (Electricity)
76	MyPower Product Rules

77	MyPower Legal Sign off
78	Horizon Power Welcome Letter
79	Hardship and HUGS Overview
80	Financial Hardship Policy
81	Customer Service Policy
82	Mercantile Referrals Process
83	Horizon Power Billing Overview
84	Horizon Power Standard Billing Template
85	Payment Arrangement letter
86	Estimated Bill Template
87	Planned Power Interruption Form
88	Extended Outage Payment Scheme Process
89	Connection Application Form
90	Work Instruction - Life Support Processes
91	Life Support Process Flows
92	Emergency Procedure – Severe Storm, Cyclone, Flood and Bushfire Response
93	Power Quality Investigation Handbook
94	2017 NQRS Independent Audit Report
95	2019 NQRS Independent Audit Report
96	Asset Management Strategy
96	Crisis and Emergency Management Plan
97	Horizon Power Supply Extension Policy
98	Horizon Power's New Connections Exceeding 20 Days Flow Map
99	Critical Customer Policy
100	Regional Contingency Plan
101	Horizon Power Compulsory Move In Script
102	Customer Billing log
103	Work instruction – Hardship Utilities Grants Scheme (HUGS)
104	HUGS Evaluation Register
105	Velocity Credit Cycle
106	Horizon Power Application Guide
107	Pre-payment Meter Finalisation Report
108	Processing Customer Complaints Work Instruction
109	Ombudsman Complaints Work Instruction
110	IT Disaster Recovery Plan
111	IT Policy
112	Password Policy Active Directory
113	Technical Rules Handbook
114	Asset Management Reports
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