

2021 Post Audit Implementation Plan – Change Energy Pty Ltd – ERL 25

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	MANAGEMENT ACTION	POSITION ACCOUNTABLE	TARGET COMPLETION DATE
01/2021	29 B2 <i>Electricity Industry Customer Transfer Code 2016</i> Clause 4.7 Failure to nominate a transfer date in accordance with the specified timeframes on 11 occasions. Improved control procedures are required.	In order to ensure the nominated transfer date is compliant with the specified times frames in the Customer Transfer Code, the Licensee could strengthen control processes and revise relevant Control Procedure. Undertake the following corrective actions: <ul style="list-style-type: none"> ▪ Update Account Management and Sales Process and the Change Energy New Customer Set Up Process Flow to reflect the consideration of public holidays, location and meter types installed or required. ▪ Determine whether the CE Customer Portal can be updated to include a check box to confirm consideration has been given for public holidays. This may be able to be programmed into the system. ▪ Ensure the organisation has established a process for change management in relation to legislative and other requirements i.e., legislative changes, amendments to Build Pack. ▪ Notify the Network Operator of the issue relating to circumstances where CTRs that did not meet the specified timeframes could be submitted into the Web Portal and consult to explore solutions. 	<ul style="list-style-type: none"> ▪ Add WA public holidays to the Corporate Calendar. ▪ Update Account Management and Sales Process and New Customer Set up Process to use Corporate Calendar to determine the corrected time frame to customer transfer ▪ A Business System Manual review will be added to the corporate calendar ▪ Update the above processes to include a requirement to notify Western Power of issues with the Web Portal 	Business Operations Manager	1 May 2022

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03/2021	124 B2 <i>Electricity Industry Act 2004</i> <i>Section 11</i> Retail Licence, condition 4.5.1 A non-compliance was noted in regards to the failure to include the applicable Type 2 non-compliance in the subsequent annual compliance report. The control environment (i.e. use of internal audit) in relation to the correct collection and handling of data that the Licensee supplies to ERA and/or compliance related activities were not adequate to ensure accurate reporting of information to the ERA	Further develop the 2020 Licence Obligations spreadsheet (note revised version Electricity Compliance Reporting Manual, February 2022) to use as an internal audit tool in the preparation of annual compliance reports to ensure ongoing accuracy and integrity of data reported to the ERA.	<ul style="list-style-type: none"> ▪ Updates to the Business System Manual and underlying processes and procedures from the Audit will address these issues. ▪ 2020 Licence Obligation Spreadsheet will be updated. 	Business Operations Manager/ CEO	1 May 2022
04/2021	133 B2 <i>Code of Conduct for the Supply of Electricity to Small Use Customers 2018</i> Clause 2.3(2) For the duration of the audit period when entering a NSC (i.e. ESA), the Licensee, did not include a reference to general information on the safe use of electricity in the ESA new contract process. 135 B2 Clause 2.3(5) Subject to subclause 2.3(3), a retailer or electricity marketing agent must obtain the customer's verifiable	Amend the Terms & Conditions (NSC) to specifically include the requirements of 2.3(2)(g) and (j). Update the BMS, Account Management and Sales Process, Sales Induction Forms, and other information systems to reference the requirements, for example, a link on Change Energy website to refer customers to Western Power Website for information on the safe use of electricity (https://www.westernpower.com.au/safety/safety-at-home/) and Western Power 24 hour telephone number for faults and emergencies.	<ul style="list-style-type: none"> ▪ Update the BMS, Account Management and Sales Process. ▪ Update Non-Standard Small Use Contract ▪ Add information to https://changeenergy.com.au/how-to-reduce-your-energy-usage/ page of Change Energy's website 	CEO	1 May 2022

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	consent that the specified information in subclause 2.3(2) and 2.3(4), as applicable, has been provided.				
05/2021	<p>155 B2 <i>Code of Conduct for the Supply of Electricity to Small Use Customers 2018 – Clause 4.5(1)</i></p> <p>Non-compliance was noted in relation to subclause (r) see below:</p> <p>(r) <i>a summary of the payment methods</i> – the customer bills do not reflect the Approved Payment Methods as agreed in the Commercial Terms, for example BPAY option was not referenced</p> <hr/> <p>188 B2 <i>C Code of Conduct for the Supply of Electricity to Small Use Customers 2018 – Code Of Conduct, Clause 5.2 –</i></p> <p>Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2</p>	Review the billing process, commercial terms and relevant control procedures to ensure the “Approved Payment Methods” align with the “How To Pay” section of the bill and the particulars required on bills are included. Ensure requirements detailed in the updated Licence Obligations spreadsheet as detailed in recommendation 03/2021.	<ul style="list-style-type: none"> ▪ Amend “Approved Payment Methods” on commercial terms. ▪ Update “How to Pay” information on bill to include credit card information 	CEO	1 April 2022 - complete