



# Wesfarmers Kleenheat Gas Pty Ltd Gas Trading Licence GTL 10, Performance Audit Report

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## **Performance Audit Trading Licence GTL 10**

The fieldwork on the performance audit of Gas Trading Licence GTL 10 for the audit period (1 February 2009 to 31 January 2011) is complete and I am pleased to submit the report to you.

In my opinion, except for matters referred to in the report, the Licensee maintained control procedures in relation to the Trading licence GTL 10 for the audit period based on the relevant clauses referred to within the scope section of this report.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Gas Trading Licence GTL 10 for the audit period on the relevant clauses referred to within the objectives section of this report. Consistent with the scope limitation, the reports are accurate.

In my opinion, the Licensee has maintained a reasonable level of compliance with the licence conditions. However, as there are 45 non compliances of which 33 are significant the licensee has considerable scope to improve the level of compliance.

Yours sincerely

Geoff Wood

Achieve It Consulting

17 July 2011

## TABLE OF CONTENTS

1	EXECUTIVE SUMMARY	4
	Business Background	
	Audit Conclusion	
1.1	PERFORMANCE AUDIT SUMMARY	5
1.2	LIMITATION OF SCOPE	5
2	PERFORMANCE AUDIT	6
2.1	PERFORMANCE AUDIT SCOPE	6
2.2	PERFORMANCE AUDIT OBJECTIVE	6
2.3	PERFORMANCE AUDIT METHODOLOGY	7
3	AUDIT RESULTS AND RECOMMENDATIONS	8
3.1	SUMMARY OF SIGNIFICANT RESULTS	8
3.2	AUDIT EVIDENCE	10
3.3	RECOMMENDATIONS FROM THE PREVIOUS AUDIT	12
3.4	COMPLIANCE OBLIGATIONS REQUIRING CORRECTIVE MEASURES	13
3.5	SUGGESTIONS FOR IMPROVEMENT	26
3.6	POST AUDIT IMPLEMENTATION PLAN	29
	APPENDIX 1- PERFORMANCE AUDIT DETAILS	30
	APPENDIX 2 COMPLIANCE SUMMARY	134

## **1 EXECUTIVE SUMMARY**

Wesfarmers Kleenheat Pty Ltd engaged Achieve It Consulting to undertake the Performance Audit as required by the Economic Regulation Authority (Authority) under the Trading Licence GTL10. This report contains the audit findings for the performance audit.

Section 11ZA of the *Energy Coordination Act 1994* requires as a condition of every licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a Performance Audit conducted by an independent expert acceptable to the Authority.

The Performance Audit has been conducted in order to assess the licensee's level of compliance with the conditions of the licence.

The Authority approved the appointment of Achieve It Consulting in January 2011 and subsequently required the development of an audit plan for approval by the Authority. An audit plan was prepared for the Trading Licence Performance audit and approval of the audit plan was provided in March 2011.

The audit has been carried out in accordance with the plan approved by the Authority and the process flowchart for performance/operational audits as detailed in the Audit Guidelines - Electricity, Gas and Water Licences ( August 2010).

The period covered by the audit is 1 February 2009 to 31 January 2011 and this report details the outcome of the audit.

### **Business background**

Wesfarmers Kleenheat Gas Pty Ltd (Kleenheat Gas) is a national company that supplies Liquefied Petroleum Gas (LPG) from cylinders and also supplies gas to customers from distribution systems that it owns and operates. In Western Australia Wesfarmers Kleenheat Gas Pty Ltd has a Gas Trading licence (GTL10) issued by the Authority under the provisions contained in the *Energy Coordination Act 1994* Trading Licence GTL10 allows Kleenheat Gas to retail LPG to customers supplied from distribution systems in Oyster Harbour (Albany) and Margaret River.

### **Audit conclusion**

The Performance Audit has been conducted in order to assess Kleenheat Gas's level of compliance with the conditions of its Trading Licence GTL10. Using the methodology outlined in the Audit Plan and assessment and testing of the control environment, the information systems, control procedures and compliance attitude, the auditor has gained a reasonable assurance that Kleenheat Gas has complied with its Trading licence during the audit period.

However, the auditor considers the control environment could be improved if the licensee's management philosophy and operating style was to change to provide a coordinated approach to ensuring compliance with the obligations contained in the Gas Compliance Manual rather than relying on the skills and experience of individual staff members to ensure compliance with the licence requirements.

In June 2010, the licensee appointed a Reticulation Manager, who has responsibility for the operation and maintenance of the reticulation networks. This includes compliance activities. One of the key areas of focus for the Reticulation Manager is to document and implement

processes to cover all of the activities which are required to meet the compliance requirements, and effectively operate the networks. It is expected that once this work is completed the control environment will be improved.

During the audit period 1 February 2009 to 31st January 2011, in my opinion the licensee has complied with its Trading Licence, and the obligations contained in the Gas Compliance Reporting Manual (September 2009 and November 2010). There are a number of non-compliances of which a number are significant and need urgent attention by the licensee and the remaining are important but not significant.

A detailed examination of the Gas Marketing Code of Conduct (GMCOG) revealed that the definition of a gas marketing agent includes the customer service personnel of the licensee. As such the licensee is considered significantly non-compliant in respect of the majority of obligations under the Gas Marketing Code because the customer service personnel were unaware of the requirements of the GMCOG. As this is a significant non-compliance remedial action needs to be taken to rectify the situation as soon as possible.

It is noted that one of these non-compliances relating to the provision of information on the bill was highlighted in the previous audit and although the licensee included action in the implementation plan to address the non compliance it is still outstanding. This is considered a significant non compliance.

This audit report is an accurate representation of the auditor's findings and opinions.

## 1.1 PERFORMANCE AUDIT SUMMARY

A comprehensive report of the audit findings as applicable to the Gas Compliance Reporting Manual (September 2009 and November 2010) is included in Appendix 1 and Appendix 2 contains a summary of the compliance rating for each obligation.

**Table 1 Operational/performance compliance rating scale**

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY NON-COMPLIANT	1	Significant weaknesses and/or serious action required
	Na	Not Applicable
	Nr	Not Rated

**Note** - Where an obligation was not exercised in the audit period, it was not possible to form an opinion about compliance and the item was not rated.

## 1.2 LIMITATION OF SCOPE

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

## **2.0 PERFORMANCE AUDIT**

### **2.1 PERFORMANCE AUDIT SCOPE**

The scope of the audit is to:

- Assess the licence holders' internal compliance systems; and
- Assess the licence holders' compliance with its licence.

for the period 1 February 2009 to 31 January 2011. The time period over which this audit was conducted was 2 March 2011 to 20 April 2011.

A previous audit was conducted for the period 1 February 2007 to 31 January 2009 and the obligations that required attention by the licensee from that audit are revisited in this audit.

As there was no performance standards defined within the Trading Licence the obligations contained in the Authority's Gas Compliance Reporting Manual (September 2009 and November 2010) were used as the performance criteria for assessing compliance.

The following people were interviewed during the Performance Audit:

- David Andrews, Reticulation Manager
- Sally Birch, Team Leader Credit – Funds Management & Reticulation
- Andrew Goodyear, Acting Team Leader Reticulation
- Brendan McColl, Manager Retail and Marketing
- Helen Scott, Learning and Development Consultant Human Resources

### **2.2 PERFORMANCE AUDIT OBJECTIVE**

The objective of the Performance Audit, as defined by the Audit guidelines, is to assess the effectiveness of the measures taken by the licensee to meet the obligations of the performance and quality standards referred to in the licence.

In addition to compliance requirements, a specific focus is to be taken on the systems and effectiveness of processes used to ensure compliance with the standards, outputs and outcomes required by the licence. The audit outcome is to both identify areas of non-compliance and areas of compliance where improvement is required and to recommend corrective action as necessary.

The Audit was conducted in three phases as defined in the Audit Guidelines. The phases and the appropriate audit guide/tool are detailed in table below:

**Table Performance Audit Methodology and Allocated hours**

<b>Phase</b>	<b>Auditor</b>	<b>Hours</b>	<b>Relevant Auditing Standard</b>
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	G Wood	49	ASA 300 replaces AUS 302: Planning ASA 315 replaces AUS 402: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	G Wood	16.5	AUS 810: Special Purpose Reports on Compliance summary of Control Procedures
3. Fieldwork and Report Preparation Assessment and testing of; <ul style="list-style-type: none"> <li>• The control environment</li> <li>• Information system</li> <li>• Compliance procedures</li> <li>• Compliance attitude</li> </ul>	G Wood	63	AUS 502: Audit Evidence AUS 806: Performance Auditing

### 2.3 PERFORMANCE AUDIT METHODOLOGY

A risk assessment, assessment of the control environment and allocation of audit priorities was undertaken in accordance with the Audit Guidelines-Electricity, Gas and Water licenses (August 2010) on each obligation relating to the trading licence of the licensee as contained in the Gas Compliance Reporting Manual (September 2009 and November 2010) issued by the Authority. By assessing the licensee's compliance with each of the obligations in the Manual for the audit period the auditor considered it would be possible to form an opinion on the effectiveness of the licensee's performance with its trading licence.

The Gas Compliance Reporting Manual (September 2009 and November 2010) as published on the Authority's website specifically classifies each licence condition according to a compliance rating. As the audit is only related to the Trading licence held by the licensee the majority of the obligations are either rated moderate or minor for non-compliance.

In accordance with the Audit Guidelines (August 2010, section 9.4.3) the audit plan submitted and approved by the Authority contains for each compliance obligation, licence clause, and legislative instrument a table that identifies the risk assessment and audit priority. This table has been used as the basis for the audit and each obligation has been examined and an assessment made by the auditor on the licensee's compliance with each obligation. The table forms Appendix 1 of this report.

The examination of each obligation was carried out in accordance with the methodology contained in the audit plan and in addition a number of obligations from the previous audit (1 February 2007 to 31 January 2009) that were found to be non compliant have also been examined.

A sufficient number of bills were examined to ensure that all changes to the information contained in the bill were captured together with sufficient assurance that only bills with actual meter readings had been sent to customers.

The interviews and enquiries conducted enabled:

- An understanding of the control environment and the attitude and expertise of the staff to be determined;
- The information systems and processes employed to maintain compliance with the licence conditions to be examined and their effectiveness tested; and
- Policies and procedures that support the licence obligations to be examined.

### 3.0 AUDIT RESULTS AND RECOMMENDATIONS

The results of the audit are summarised below.

Assessment	Audit Priority 1	Audit priority 2	Audit priority 4	Audit priority 5
Compliant 5		2	53	14
Compliant 4			3	3
Compliant 3			1	
Non-compliant 2			6	6
Significantly non compliant 1		1	31	1
Not Rated		1	61	50
Not Applicable			2	3

### 3.1 SUMMARY OF SIGNIFICANT RESULTS

A number of non compliances have been recorded (1, 57, 60, 73, 80, 82, 106, 107,114-120, 122-126, 128-131,136-140, 143, 144, 156, 208, 213, 214, 215, 216, 217, 218, 229, 246, 251, 266 and 119, and 216 from the September 2009 manual). A detailed examination of the Gas Marketing Code of Conduct (GMCOC) revealed that the definition of a gas marketing agent includes the customer service personnel of the licensee. As such the licensee is considered to be significantly non-compliant in respect of the majority of obligations under the Gas Marketing Code (obligations 73, 114 to 144 and 119 from the September 2009 manual)) because the customer service personnel were unaware of the requirements of the GMCOC. This is considered a significant non-compliance and remedial action needs to be taken to rectify the situation as soon as possible.

Additionally there are a small number of non compliances that are considered significant that require the urgent attention of the licensee and the remainder are not material to the delivery of the licence obligations.

Item 1 relates to the time required to pay applicable fees to the Authority although the Licensee paid the fees in accordance with their normal business practice it was not in accordance with the required timeframe.

Item 57 relates to the provision of information on the tariffs charged and no information is provided by the licensee. This is considered a significant non compliance and action should be taken as soon as possible to ensure compliance.

Items 60, 82 and 156 relate to information on the customers' bill. The bill contains the required information except for the following:

1. Information on refundable advances. As the licensee does not charge refundable advances this would seem inappropriate.
2. The availability of interpreter services whilst missing from the bill it is referenced in the customer charter which is on the *Authority* and Licensee's web sites.
3. Availability of the customer charter.
4. Availability of and cost of meter accuracy tests.
5. The need show the amount of credit or arrears (This is currently done via a statement only).

The absence of this information on the bill is considered to be a significant matter and the licensee should make the necessary changes to the bill as soon as possible.

Item 80 relates to when a non-standard contract is due to expire a licensee must issue a notice in writing to a customer at least 2 months prior to the expiry date (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date, alternative supply options, and the terms and conditions for continued supply post contract expiry. During the audit period the only non-standard contract issued by the licensee expired and no written notice was provided. With only one customer on a non-standard contract, this is not considered to be significant non-compliance.

The licensee is now aware of the obligations under the Gas Marketing Code (obligations 116 - 144 and obligation 73) and a recommendation of the report to rectify the non-compliance is for all customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outlines the licensee's requirements under the code and how compliance will be achieved including the necessary record keeping.

Items 208, 213, 214, 215, 216, 217 and 218 are significant non-compliances as they relate to the licensee's hardship policy. The licensee has still to complete and introduce a hardship policy and this needs to occur as soon as possible to enable the licensee to comply with these important obligations. Obligation 216 from the September 2009 manual requires details on the licensee's hardship policy to be provided to selected parties on request and again as the policy is yet to be introduced this obligation is also a significant non-compliance.

Item 246 requires the licensee to include the telephone number for their special information services and for independent multi-lingual services and National Interpreter Symbol on selected documents. The only applicable document is the bill and this information needs to be included on the bill as soon as possible.

Item 251 requires a licensee to provide information on utilising its complaints handling process. The licensee's complaints manual does not address this issue. This is considered a significant non compliance and remedial action should be carried out at the earliest opportunity.

Item 266 relates to the Minister receiving reports before they are published by the licensee a process to be developed by licensee for submitting the report directly to the Minister within the required timeframe.

The auditor also considers the control environment could be improved if the licensee's management philosophy and operating style was to change to provide a coordinated approach to ensuring compliance with the obligations contained in the Gas Compliance Manual rather than relying on the skills and experience of individual staff members to ensure compliance with the licence requirements.

In June 2010, the licensee appointed a Reticulation Manager, who has responsibility for the operation and maintenance of the reticulation networks. This includes compliance activities. One of the key areas of focus for the Reticulation Manager is to document and implement processes to cover all of the activities which are required to meet the compliance requirements, and effectively operate the networks. It is expected that once this work is completed the control environment will be improved.

The audit also found that the licensee needs to put in place a robust system to ensure that any reporting to the Authority and other statutory organisations is carried out in accordance with any directions or guidelines provided by the Authority or statutory organisation using the required format within the required timeframe and adequate records of such activities maintained. Additionally a process needs to be established to provide for reporting to the Minister as required under the legislation.

### **3.2 AUDIT EVIDENCE**

The following evidence was gathered for the audit:

1. Legislation and standards
  - *Energy Coordination Act 1994*
  - *Gas Standards Act 1972*
  - *Energy Coordination (Customer Contracts) Regulations 2004*
  - *AG 755 1998 Natural Gas Customer Service Code*
  - Gas Customer Code
  - Gas Marketing code of Conduct
  - Gas Trading Licence GTL10
  
2. Licensee's documents
  - Annual report for balance sheets and financial indicators
  - Prospective customers package
  - Customer safety awareness program
  - Customer service charter
  - Small Use Gas Supply Agreement Terms and Conditions

- Complaints handling Manual and policy
- OMS Document Register
- Annual information returns
- Customer Bills and Statement

### 3.3 RECOMMENDATIONS FROM THE PREVIOUS AUDIT

Ref number	Obligations	Description	Previous audit Recommendation	Action taken	Current Status/ Action required
119	Trading licence Clause 14.2	A licensee must, unless otherwise notified in writing by the Authority, review the customer service charter at least once every 36 months and submit the results of that review to the Authority within 5 days after it is completed.	To ensure that regular reviews occur, the Licensee should establish a time table for regular 36 month reviews of the customer charter.	The licensee has included the need to review the customer service charter in the OMS document register. The last review recorded in the register took place in October 2009.	A process is now in place to ensure the customer service charter is reviewed periodically.  The obligation is therefore now compliant.
129	Trading Licence Schedule 3 Clause 4.1	Energy Coordination Act 1994 Section 11M  The requirement is that a Licensee must lodge a customer safety awareness program with the Authority within 3 months of the commencement date.	A process be established for submitting required documents for approval.	The OMS document register contains information on documents that need to be submitted to the Authority to ensure the required time frames are achieved.	As a process is now in place for submitting documents for approval the obligation is now compliant.
60	Trading licence Clause 5.1	Energy Coordination (Customer Contracts) Regulations 15(1) AGA Code Clauses 4.2.3.1, 4.2.3.2 and 4.2.3.3.  A licensee must prepare a bill in accordance	Bill format to be amended to include information required by the AGA Code.	In November 2010 changes were made to the bill but the following have still to be included to comply with the AGA Code: <ul style="list-style-type: none"> <li>Amount of arrears or</li> </ul>	Although a change was made to the information provided on the bill a number of changes are still required to the bill to comply with the AGA

		with the terms specified in the AGA Code		<ul style="list-style-type: none"> <li>credit; Availability of and cost of meter accuracy tests; and</li> <li>The availability of interpreter services.</li> </ul>	<p>code.</p> <p>The licensee is to make the changes as soon as possible to ensure the bill is compliant.</p> <p>This obligation is still non compliant and it is considered a significant non compliance.</p>
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### 3.4 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

#### November 2010 Gas Compliance Manual

<b>Item 1 (1)</b> Trading Licence Clause 4.1	Compliance Rating Non-Compliant - 2
<i>Energy Coordination Act section 11Q(1-2)</i>	
The requirement is that a Licensee must pay the applicable fees in accordance with the Regulations. (Energy Coordination (Licensing Fees) Regulations Clause 4 & 5).	
<b>Corrective Action</b>	
Licensee to implement a process that ensures payment within the required period rather than in accordance with their standard payment period.	

<b>Item 57 (57)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant -2
<i>Energy Coordination (Customer Contracts)Regulation 14(3)</i> AGA Code Clause 4.1.2.1 & 4.1.2.2	
A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.	
<b>Corrective Action</b>	
Customer to be provided with notice describing the tariff charged at the time of becoming a customer and each time the tariff changes.	

<b>Item 60 (60)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant-1
<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3	
A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.	
<b>Corrective Action</b>	
The bill format to be revised to comply with the requirements of the AGA code which require the following to be included: amount of arrears or credit, information on meter testing and the availability of interpreter services..	

<b>Item 73 (73)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant -2
<i>Energy Coordination (Customer Contracts) Regulation 27(4) &amp; 40(3)</i>	
A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved, including the action to be taken if a customer query's a contract.	

<b>Item 80 (80)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant - 2
<i>Energy Coordination (Customer Contracts) Regulation 44</i>	
When a non-standard contract is due to expire a licensee must issue a notice in writing to a customer at least 2 months prior to the expiry date (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.	
<b>Corrective Action</b>	
Licensee to implement a process that ensures the customer is provided with the required information in the required time frame.	

<b>Item 82 (82)</b> Trading Licence Clause 14.1	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(2)</i>	
A licensee must from time to time provide the customer with advice with their bill that a customer service charter is available free of charge.	
<b>Corrective Action</b>	
Licensee to implement a process for providing advice with a customer's bill from time to time that a	

customer service charter is available free of charge. This should be achieved by including the information on the bill.

<b>Item 106 (106)</b> Trading Licence Clause 12.2	Compliance rating Non-compliant -2
<i>Energy Coordination Act section 11M</i>	
A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.	
<b>Corrective Action</b>	
Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.	

<b>Item 107 (107)</b> Trading Licence Clause 12.3	Compliance Rating Non-compliant-2
<i>Energy Coordination Act section 11M</i>	
A licensee must comply with any direction given by the Authority in relation to the scope, process and methodology of the standard form contract review.	
<b>Corrective Action</b>	
Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.	

<b>Item 114 (116)</b> Trading Licence Clauses 19.1	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP</i>	
The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 115 (117)</b> Trading Licence clause 19.2	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M and 11ZPP</i>	
A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline	

the licensee's requirements under the code and how compliance will be achieved.

<b>Item 116 (118)</b> Trading Licence Clause 19.1	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A marketer must ensure that its marketing representatives comply with Part 2 of the Code of Conduct.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 117 (120)</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 118</b> Trading Licence clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)</i> A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Corrective Action</b> All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 119 (121)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<b>Licence:</b> <i>Trading</i>	

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)*

Where a standard form contract is not entered into as a result of door to door marketing or for a non-standard contract initiated by telephone, a marketing representative must obtain and make a record of the customer's verifiable consent that the specified information has been given.

**Corrective Action**

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 120 (122)** Trading Licence Clause 19

Compliance rating  
Non- Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(3)*

Where a standard form contract is entered into as a result of door to door marketing or for a non-standard contract (other than that initiated by the customer by telephone or electronic means), a marketing representative must obtain the customer's written acknowledgement that the specified information has been given.

**Corrective Action**

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 122 (124)** Trading Licence Clause 19

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)*

Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.

**Corrective Action**

Licensee to provide the following information as required under the Gas Marketing Code of Conduct:

- (a) How the *customer* may obtain –
  - (i) a copy of the *retailer's Customer Service Charter*;
  - (ii) a copy of the *Code*; and
  - (iii) details on all relevant tariffs, fees, charges, *alternative tariffs* and service levels that may apply to the *customer*;
- (b) The scope of the *Code*;
- (c) That a *retailer, distributor, marketer* and *marketing representative* must comply with the *Code*;
- (d) How the *retailer* may assist if the *customer* is experiencing *payment difficulties* or *financial hardship*;

- (e) The *concessions* that may apply to the *customer*;
- (f) The *distributor's* 24 hour telephone number for faults and emergencies;
- (g) How the *customer* may access the *retailer's*:
  - (i) multi-lingual services (in languages reflective of the *retailer's customer* base); and
  - (ii) *TTY* services;
- (h) How to make an enquiry of, or *complaint* to, the *retailer*;
- (i) General information on the *retailer's gas customer safety awareness programme*; and
- (j) The details of any right the *customer* may have to rescind the *contract* during a *cooling-off period* and the charges that may apply if the *customer* rescinds the *contract*.

<b>Item 123 (125)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(3)</i>	
In circumstances where a standard form contract is not entered into as a result of door to door marketing, a retailer or marketing representative must give the specified information no later than with or on the customer's first bill and a copy of the contract if requested by the customer (and the customer has not previously received a copy).	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 124 (126)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(4)</i>	
In circumstances where a standard form contract is entered into as a result of door to door marketing or a non-standard contract, a retailer or marketing representative must give the specified information and a copy of the contract before the customer has entered into the contract and must obtain a written acknowledgement that the information has been given.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 125 (127)</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i>	
A marketing representative must not, when marketing, engage in conduct that is misleading,	

deceptive or likely to mislead or deceive or that is unconscionable.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 126 (128)** Trading Licence Clause 19

Compliance rating  
Non-Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)*

A marketing representative must not exert undue pressure on a customer, nor harass or coerce a customer.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 128 (130)** Trading Licence Clause 19

Compliance rating  
Non-Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(4)*

A marketing representative must ensure that all standard form contracts that are entered into as a result of door to door marketing and all non-standard contracts are in writing.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 129 (131)** Trading Licence Clause 19

Compliance rating  
Non-Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(5)*

A marketer must ensure that a customer is able to contact the marketer on the marketer's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item 130 (132)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(1)</i>	
A marketing representative must provide the information specified to the customer when marketing by means other than face to face and after having identified the purpose of the contact, if the contact is not by electronic means, the marketing representative must ask the customer whether they wish to proceed further.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 131 (133)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(2)</i>	
A marketing representative must, on request, provide the customer with it's and the retailer's complaints telephone number and marketing identification number.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 136 (138)</b> Trading Licence Clause 19	Compliance rating Non-Compliant -1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(7) &amp; 2.6(8)</i>	
Except in response to a customer request or query, a marketer must keep the specified records each time it initiates contact with a customer for the purposes of marketing.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	
The licensee to implement a process to record the information required under clause 2.6(7) and 2.6(8).	

<b>Item 137 (139)</b> Trading Licence Clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(1)</i>	
Where the customer requests not to be contacted for the purposes of marketing a marketer must ensure that a customer is not contacted on its behalf in relation to the supply of gas for a period of two years unless:	

- The customer requests contact; or
- The customer has moved premises; or
- A marketer has a legal obligation to contact the customer.

**Corrective Action**

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item 138 (140) Trading Licence Clause 19**

Compliance rating  
Non-Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(2)*

A marketer must keep a record of each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request.

**Corrective Action**

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.

**Item 139 (141) Trading Licence Clause 19**

Compliance rating  
Non-compliant -1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(3)*

A marketer must give a copy of the record to the Gas Ombudsman or the Authority on request.

**Corrective Action**

Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.

**Item 140 (142) Trading Licence Clause 19**

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(4)*

A marketer must provide the customer on request with written confirmation that the customer will not be contacted for the next two years.

**Corrective Action**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item 143 (145)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(1)</i>	
A marketer must keep a record of each complaint made by a customer or a person contacted for the purposes of marketing and, on request, gives all information relating to the complaint to the Gas Ombudsman.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 144 (146)</b> Trading Licence Clause 19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i>	
A marketer must keep a record or other information required by the Code to be kept for at least 2 years.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>156 (158)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(1)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must include minimum prescribed information on the customer's bill, unless the customer agrees otherwise.	
<b>Corrective Action</b>	
The bill to be amended to include the minimum prescribed information required by the code.	
Until 1 July 2011 the only item missing as required under clause 4.5(1) of the Gas Customer Code is the inclusion of the amount of arrears and credits.	

<b>Item 208 (209)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its	

hardship policy referred to in clause 6.10(2)(d).

**Corrective Action**

Hardship policy to be finalised and implemented.

**Item 213 (214)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 6.10(1)

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11M*

A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.

**Corrective Action**

Hardship policy to be finalised and implemented.

**Item 214 (215)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 6.10(2)

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11M*

A retailer must ensure that the hardship policy complies with the specified criteria.

**Corrective Action**

Hardship policy to be finalised and implemented.

**Item 215** Trading Licence clause 2.1 and Schedule 2  
Gas Customer Code clause 6.10(3)

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11M*

A retailer must give residential customers, financial counsellors and relevant consumer representative organisations, details of the financial hardship policy, at no charge. The retailer must provide all residential customers experiencing financial hardship details of the hardship policy.

**Corrective Action**

Hardship policy to be finalised and implemented.

**Item 216 (217)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 6.10(4)

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11M*

A retailer must keep a record of the specified information related to the hardship policy.

**Corrective Action**

On completion of the Hardship policy and its implementation the specified information required in

the Gas Customer Code is to be recorded.

<b>Item 217</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must, unless notified in writing by the Authority, review its hardship policy at least annually and submit the review to the Authority within 5 business days after it is completed.	
<b>Corrective Action</b>	
As part of the process of developing the hardship policy the licensee is to include a process for reviewing the policy and submitting it to the authority in the required time frame.	

<b>Item 218</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	
<b>Corrective Action</b>	
The licensee is to have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	

<b>Item 229 (228)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(1)	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M</i>	
A retailer must give notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified.	
<b>Corrective Action</b>	
The licensee to ensure it has in place a process for giving notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified.	

<b>Item 246 (245)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M</i>	
A retailer and, where appropriate a distributor, must include the telephone number for their special information services and for independent multi-lingual services and the National Interpreter Symbol, with the words "Interpreter Services", on the documents specified.	
<b>Corrective Action</b>	
The bill to include the telephone number for independent multi-lingual services and National	

Interpreter Symbol.	
<b>Item 251 (254)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	Compliance rating Non-Compliant -1
<i>Energy Coordination Act section 11M</i>	
A retailer, distributor and marketer must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	
<b>Corrective Action</b>	
Complaints manual to be amended to include information on how a customer on request, at no charge, gets information that will assist the customer in utilising the respective complaints handling processes and a brochure developed for handing to the customer.	

<b>Item 266</b> Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(3)	Compliance rating Non-Compliant-2
<i>Energy Coordination Act section 11M</i>	
A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.	
<b>Corrective Action/Opportunity for Improvement</b>	
Process to be developed by licensee for submitting the report directly to the Minister within the required timeframe.	

## September 2009 Gas Compliance Manual

<b>Item 119</b> Trading Licence clause 21.1 and 21.2 Code of Conduct clause 2.2	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11ZPP</i>	
A marketer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified.	
<b>Corrective Action</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 216</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Compliance rating Non-Compliant-2
<i>Energy Coordination Act section 11M</i>	
A retailer must give a customer, financial counsellor or relevant consumer representative organisation, on request, details of the financial hardship policy, at no charge.	
<b>Corrective Action</b>	

Hardship policy to be finalised and implemented.

### 3.5 SUGGESTIONS FOR IMPROVEMENT

<b>Item 2 (2)</b> Trading Licence Clause 12.1	Compliance rating Compliant - 3
<i>Energy Coordination Act section 11WG(1)</i> The requirement is that a Licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.	
<b>Opportunity for Improvement</b>  The licensee should either include a copy of the Small Use Gas Supply Agreement Terms and Conditions in the information pack or on their website. The agreement provides for customer to sign it on the last page signifying they are entering into a legally binding contract. If it is intended that the customer does not need to sign the agreement consideration should be given to removing this section of the document. A number of the clauses in the agreement do not apply in Western Australia and to avoid confusion for the customer consideration should be given to their deletion.	
<b>Item 4 (4)</b> Trading Licence Clause 5.1	Compliance rating Compliant - 4
<i>Energy Coordination Act section 11WK(1-2)</i> Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.	
<b>Opportunity for Improvement</b>  Licensee to consider including small use gas supply agreement in welcome pack and to make a decision on whether the customer should sign the agreement as provided for in the document.	
<b>Item 5 (5)</b> Trading Licence Clause 5.1	Compliance rating Compliant- 5
<i>Energy Coordination Act section 11WK(3)</i> A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.	
<b>Opportunity for Improvement</b>  Consideration to be given to ensuring all customers are provided with a Standard form contract.	

<b>Item 56 (56)</b> Trading Licence Clause 5.1	Compliance rating Compliant-4
<i>Energy Coordination (Customer Contracts)Regulation 14(2)</i>	
A licensee must inform customers that the supply charge is either for residential or non residential supply; includes a specified fixed component and specified usage component; and describes the circumstances a customer needs to meet to qualify for residential tariffs.	
<b>Opportunity for Improvement</b>	
Information that provides details on the makeup of the supply charge to be provided on the bill or in the terms and conditions document	

<b>Item 58 (58)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 14 AGA Code Clause 4.1.3.1 &amp; 4.1.3.2</i>	
A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
<b>Opportunity for Improvement</b>	
Process to be put in place to give notice of a variation in tariffs charged, and provide these notices to customers affected by the change no later than the next bill.	

<b>Item 72 (72)</b> Trading Licence Clause 5.1	Compliance rating Compliant - 4
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 20(2) AGA Code Clause 4.3.5.1</i>	
A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.	
<b>Opportunity for Improvement</b>	
Process should be documented.	

<b>Item 113 (115)</b> Trading Licence Schedule 3 Clause 3.1	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A Licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.	
<b>Opportunity for Improvement</b>	
The licensee to put in place a process for notifying the Minister as all previous notifications to the Minister have been by the Authority on behalf of the licensee.	

<b>Item 121 (123)</b> Trading Licence Clause 19.1 and 19.2	Compliance rating Compliant - 4
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)</i>	
Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must offer to provide the customer with a copy of the contract and, where this offer is accepted by the customer, provide a copy of the contract at that time or as soon as possible thereafter.	
<b>Opportunity for Improvement</b>	
The welcome pack could be improved by including a copy of the small use gas Supply Agreement terms and Conditions.	

<b>Item 198 (199)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)	Compliance rating Compliant - 4
<i>Energy Coordination Act section 11M</i>	
A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within three business days from when the residential customer informs a retailer that the customer is experiencing payment problems.	
<b>Opportunity for Improvement</b>	
The assessment is left to the discretion of the Team Leader Credit and Funds Management & Reticulation consideration should be given to documenting the process. Hardship Policy to be implemented and form part of the assessment process.	

<b>Item 204 (205)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3	Compliance rating Compliant - 4
<i>Energy Coordination Act section 11M</i>	
A retailer must offer the alternative payment arrangements, and advise the residential customers that additional assistance may be available, in circumstances where a residential customer is assessed as experiencing payment difficulties or financial hardship.	
<b>Opportunity for Improvement</b>	
Licensee to give consideration to developing a policy or process to assist personnel in dealing with issues of alternative payments assistance etc.	

### **3.6 POST AUDIT IMPLEMENTATION PLAN**

The Licensee will provide a post audit implementation plan.

## APPENDIX 1- PERFORMANCE AUDIT DETAILS

### DETAILED AUDIT FINDINGS

The following sets out the audit findings. The obligations are listed as they appear in the November 2010 Gas Compliance Reporting Manual and the corresponding obligation number from the September 2009 Gas Compliance Reporting Manual is shown alongside in brackets (1)

#### LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION ACT 1994

Item 1(1) Trading Licence Clause 4.1	Compliance Rating Non-Compliant - 2
<p><i>Energy Coordination Act section 11Q(1-2)</i></p> <p>The requirement is that a Licensee must pay the applicable fees in accordance with the Regulations. (Energy Coordination (Licensing Fees) Regulations Clause 4 &amp; 5).</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined the accounts paid ledger</p>	
<p><b>Observations</b></p> <p>Established date when invoice was received and fees were paid.</p> <p>Licensee operates on a 30 day payment cycle. The 30 days commence at the start of the month that follows the month in which the invoice is received.</p> <p>The licence requires at clause 4 that the fees be paid according to the regulations which set the values but not the payment time. Clause 5 of the licence requires compliance with applicable legislation including the Act, which requires payment within a month.</p>	
<p><b>Compliance summary:</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>The Licensee to implement a process that ensures payment within the required period (30 days) rather than in accordance with their standard payment period.</p>	

Item 2 (2) Trading Licence Clause 12.1	Compliance rating Compliant - 3
<p><i>Energy Coordination Act section 11WG(1)</i></p> <p>The requirement is that a Licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.</p>	
<p><b>Verification/Tests</b></p>	

<p>Interviewed Reticulation Manager</p> <p>Examined information pack sent to new consumers and Small Use Gas Supply Agreement Terms and Conditions</p> <p>Examined the non-standard contract that relates to the only commercial customer.</p>
<p><b>Observations</b></p> <p>Information pack sent to new customers includes a welcome letter that includes a paragraph stating by accepting supply from the licensee the customer agrees to be bound to the terms and conditions contained in the small use gas supply agreement and the document can be obtained by calling the licensee on their 1300 number or visiting the licensee's website.</p> <p>A check on the website showed that the document is not available on the website.</p>
<p><b>Compliance summary:</b></p> <p>The licensee is compliant as supply is subject to a contract.</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>The licensee should either include a copy of the Small Use Gas Supply Agreement Terms and Conditions in the information pack or on their website. The agreement provides for customer to sign it on the last page signifying they are entering into a legally binding contract. If it is intended that the customer does not need to sign the agreement consideration should be given to removing this section of the document. A number of the clauses in the agreement do not apply in Western Australia and to avoid confusion for the customer consideration should be given to their deletion.</p>

<p><b>Item3 (3)</b> TradingLicenceClause13.1</p>	<p>Compliance rating Not rated</p>
<p><i>EnergyCoordinationActsection11WG(2)</i> Therequirementisthatalicenseemustcomplywithadirectiongiventothelicenseeundersection11WI.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p>	
<p><b>Observations</b></p> <p>The <i>Authority</i> has not issued any directions requiring amendments to the standard form contract during the audit period. However the interview verified that should a direction be given the licensee would comply.</p>	
<p><b>Compliance summary:</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<b>Item 4 (4)</b> Trading Licence Clause 5.1	Compliance rating Compliant - 4
<p><i>Energy Coordination Act section 11WK(1-2)</i></p> <p>Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined Small Use Gas Supply Agreement Terms And Conditions (contract)</p>	
<p><b>Observations</b></p> <p>All new customers are provided with a welcome letter that includes a paragraph that states by accepting supply from the licensee the customer agrees to be bound to the terms and conditions contained in the small use gas supply agreement.</p>	
<p><b>Compliance summary</b></p> <p>Customers do not enter into a contract but by receiving the welcome letter accept the terms and conditions contained in the contract.</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Licensee to consider including small use gas supply agreement in welcome pack and to make a decision on whether the customer should sign the agreement as provided for in the document.</p>	

<b>Item5 (5)</b> TradingLicenceClause5.1	Compliance rating Compliant-5
<p><i>EnergyCoordinationActsection11WK(3)</i></p> <p>A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined Small Use Gas Supply Agreement Terms And Conditions (contract)</p>	
<p><b>Observations</b></p> <p>Licensee provides supply to all small use customers in accordance with Small Use Gas Supply Agreement Terms And Conditions. Licensee does not have non-standard contracts for small use customers.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Consideration to be given to ensuring all customers are provided with a Standard form contract.</p>	

<b>Item 6 (6)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<p><i>Energy Coordination Act section 11X (3)</i></p> <p>A licensee must take reasonable steps to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p>	
<p><b>Observations</b></p> <p>No interruptions occurred during the audit period. However it was determined during the interview as the trader is also the distributor a process exists for dealing with customer outages which includes provisions to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause.</p>	
<p><b>Compliance summary:</b></p> <p>Not rated.</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<b>Item 10 (10)</b> Trading Licence Clause 18.1	Compliance rating Compliant - 5
<p><i>Energy Coordination Act section 11ZA(1)</i></p> <p>The requirement is that a Licensee must provide the <i>Authority</i> with a performance audit by an independent expert acceptable to the <i>Authority</i> within 24 months of commencement and every 24 months thereafter (or longer if the <i>Authority</i> allows).</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined letter from Authority approving Achieve It Consulting as the auditor.</p>	
<p><b>Observations</b></p> <p>Achieve It Consulting with the approval of the Authority has been appointed to undertake the performance audit. The audit Period is 1 February 2009 to 31 January 2011.</p>	
<p><b>Compliance summary:</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<b>Item 17 (17)</b> Trading Licence Clause 5.1	Compliance rating Not Applicable
<i>Energy Coordination Act section 11ZK (3)</i>	
A licensee must pay the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
As the retailer and distributor are the same company the distributor is responsible for the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.	
<b>Compliance summary:</b>	
Not Applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 24 (24)</b> Trading Licence Clause 20	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZQH</i>	
The requirement is that the Licensee must not supply gas to customers unless the Licensee is a member of an approved Gas Industry Ombudsman Scheme and is bound by any decision or direction of the ombudsman under the Scheme.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
Examined payments ledger	
<b>Observations</b>	
The licensee is a member of Gas Industry Ombudsman Scheme and the payments ledger entries confirmed that the licensee has paid the required fees. During the audit period no decision or direction was provided by the ombudsman.	
<b>Compliance summary:.</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

**LICENCE COMPLIANCE REQUIREMENTS – GAS STANDARDS ACT 1972**

<b>Item 25 (25)</b> Trading Licence Clauses 5.1	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11Z</i>	
The requirement is that a Licensee must comply with the standards of the <i>Gas Standards Act 1972</i> .	

<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined <i>Gas Standards Act 1972</i></p>
<p><b>Observations</b></p> <p>The majority of obligations under the <i>Gas Standards Act 1972</i> that apply in regard to supplying gas are the responsibility of the distributor and discussion with the licensee regarding the other obligations that apply to a retailer regarding gas fitting work and the supply of gas appliances indicated that if any of the activities occurred they would be undertaken in accordance with the Act.</p> <p>Discussion with EnergySafety confirmed that the gas quality has been in compliance with the regulatory requirements throughout the audit period.</p>
<p><b>Compliance summary:.</b></p> <p>Compliant</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

**LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION (CUSTOMER CONTRACTS) REGULATIONS 2004**

Item 32 (32) Trading Licence Clause 5.1	Compliance rating Not rated
<p><i>Energy Coordination (Customer Contracts) Regulation 12.(2)</i></p> <p>Except in prescribed circumstances, a licensee must not disconnect or cause disconnection to occur if —</p> <p>(a) a customer has provided to the licensee a written statement from a medical practitioner to the effect that supply is necessary in order to protect the health of a person who lives at the customer's supply address; and</p> <p>(b) the customer has entered into arrangements acceptable to the licensee in relation to payment for gas supplied.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>Informed that the policy of the Licensee is not to disconnect consumers. Examination of consumer records and accounts verified that disconnections have not occurred.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

Item 33 (33) Trading Licence Clause 5.1	Compliance rating Not rated
<p><i>Energy Coordination (Customer Contracts) Regulation 12.(4)(a)</i></p>	

Before disconnecting supply for non-payment of a bill, a licensee must give a written reminder notice to a customer not less than 14 business days after the day on which a bill was issued advising the customer that payment is overdue and requiring payment to be made on or before the day specified in the reminder notice (being a day not less than 20 business days after the billing day).

**Verification/Tests**

Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager

**Observations**

Informed that policy of the Licensee is not to disconnect consumers.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 34 (34)** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12.(4)(b)*

Before disconnecting supply for non-payment of a bill, a licensee must give a disconnection warning to a customer not less than 22 business days after the billing day advising the customer that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given).

**Verification/Tests**

Interviewed Acting Team Leader Reticulation and Retail and Marketing  
Examined customer records

**Observations**

Informed that policy of the Licensee is not to disconnect consumers.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item 35 (35)** Trading Licence Clause 5.1

Compliance rating  
Not rated

*Energy Coordination (Customer Contracts)Regulation 12 (5)(a)*

A licensee must reconnect supply to a customer within 10 business days after disconnection for non-payment of a bill if the customer pays the overdue amount or makes an arrangement for its payment and the customer has paid any applicable reconnection fee.

**Verification/Tests**

<p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p> <p>Examined consumer records and accounts</p>
<p><b>Observations</b></p> <p>Informed that policy of the Licensee is not to disconnect consumers. Therefore reconnections do not occur.</p>
<p><b>Compliance summary</b></p> <p>Not rated</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

<p><b>Item 36 (36)</b> Trading Licence Clause 5.1</p>	<p>Compliance Rating Not rated</p>
<p><i>Energy Coordination (Customer Contracts)Regulation 12.(5)(b)</i></p> <p>A licensee must reconnect supply to a customer within 10 business days after disconnection for denial of access to a meter, if the customer provides access to the meter and the customer has paid any applicable reconnection fee.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>Informed that policy of the Licensee is not to disconnect consumers. Therefore reconnections do not occur.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item 37 (37)</b> Trading Licence Clause 5.1</p>	<p>Compliance rating Not rated</p>
<p><i>Energy Coordination (Customer Contracts)Regulation 12 (5)(c)</i></p> <p>A licensee must reconnect supply to a customer within 10 business days after disconnection for unlawful consumption of gas, if the customer pays for the gas consumed and the customer has paid any applicable reconnection fee.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p> <p>Examined consumer records and accounts</p>	
<p><b>Observations</b></p> <p>Informed that policy of the Licensee is not to disconnect consumers. Therefore reconnections do not occur. Examination of records found no evidence that reconnections had occurred.</p>	

<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>
None

<b>Item 38 (38)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(5)(d)</i>	
A licensee must reconnect supply to a customer within 10 business days after disconnection for refusal to pay a refundable advance, if the customer pays the refundable advance and the customer has paid any applicable reconnection fee.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Examined consumer records and accounts	
<b>Observations</b>	
Informed that Licensee does not disconnect consumers or require refundable advances. Examination of consumer records and accounts verified that disconnections and refundable advances do not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 39 (39)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12.1.5(e)</i>	
A licensee must reconnect supply to a customer within 20 business days after disconnection in an emergency situation or for health, safety or maintenance reasons, if the situation or problem giving rise to the need for disconnection has been rectified, and if the customer has paid any applicable reconnection fee.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Examined consumer records and accounts	
<b>Observations</b>	
No reconnections took place during the audit period as no disconnections occurred for an emergency situation or for health, safety or maintenance reasons.	
<b>Compliance summary</b>	
Not rated	

<b>Item 40 (40)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.1.2</i>	
A licensee must not disconnect supply to a customer who is unable to pay until: alternative payment options have been offered to the customer; the customer is given information on government funded concessions; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Examined consumer records and accounts	
<b>Observations</b>	
Licensee does not disconnect consumers however they offer a number of options for paying outstanding accounts that provide a consumer with considerable flexibility. Examination of consumer records and accounts verified that disconnections do not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 41 (41)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.1.3</i>	
A licensee must not disconnect supply to a business customer until: it has used its best endeavours to contact the customer; it has offered the customer an extension of time to pay the bill; and it has provided the customer a written notice of its intention to disconnect at least 5 business days notice prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Examined consumer records and accounts	
<b>Observations</b>	
The licensee has only one business customer and no disconnection occurred during the audit period	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 42 (42)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.2.1 & 5.1.2.2	
A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements; the customer is provided written advice on each occasion access was denied; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b>	
Licensee does not disconnect consumers. Examination of consumer records and accounts verified that disconnections do not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 43 (43)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.3.1 & 5.1.3.2	
A licensee who disconnects in the event of an emergency must provide a 24 hour information service, estimate the time when gas supply will be restored and use best endeavours to restore supply when the emergency is over.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined records	
<b>Observations</b>	
No disconnections for emergency events occurred in the audit period. If such an event occurred as the trader and distributor are the same company it would be the responsibility of the distributor to disconnect the customer. The licensee has a 24 hour customer information service.	
<b>Compliance summary:</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 44 (44)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 12(6)</i> AGA Code Clause 5.1.4.1 & 5.1.4.2 A licensee who disconnects supply for health and safety reasons must provide the customer written notice of the reason; allow the customer 5 business days to remove the reason where the customer is able to; and after the 5 business days issued a notice to the customer of its intention to disconnect supply at least 5 business days notice prior to the disconnection date.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> No disconnection for the above reasons occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 45 (45)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 12(6)</i> AGA Code Clause 5.1.5.1 & 5.1.5.2 A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice; and used best endeavours to minimise disruption and restore supply.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> Disconnections of this type would be the responsibility of the distributor. No such disconnections occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 46 (46)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 12(6)</i> AGA Code Clause 5.1.7.2 A licensee must not disconnect supply for failure by a customer to pay a refundable advance without giving a written notice to the customer of its intention to disconnect at least 5 business days prior to the disconnection date.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	

Examined consumer records and accounts
<b>Observations</b> Licensee does require refundable advances and records confirmed no refundable advances exist.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 47 (47)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(a)</i> A licensee must not disconnect supply where the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined customer billing data base and accounts.	
<b>Observations</b> Licensee does not disconnect consumers. Examination of database and accounts verified that disconnections do not occur.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 48 (48)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.1.8.1(b)</i> A licensee must not disconnect supply where the issue is the subject of complaint by the customer and is being reviewed externally and is not resolved.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
<b>Observations</b> Licensee does not disconnect consumers. Examination of database and accounts verified that disconnections do not occur.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 49 (49)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(c) A licensee must not disconnect supply where an application for a government concession has not been decided.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> Licensee does not disconnect consumers or offer government concessions. Examination of consumer records and accounts verified that disconnections do not occur and government concessions are not provided.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 50 (50)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(d) A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager Examined consumer records and accounts	
<b>Observations</b> Licensee does not disconnect consumers. Examination of consumer records and accounts verified that disconnections do not occur.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 51 (51)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 12(6)</i> AGA Code Clause 5.1.8.1(e)&(f) A licensee must not disconnect supply after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption.	
<b>Verification/Tests</b>	

<p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p> <p>Examined consumer records and accounts</p>
<p><b>Observations</b></p> <p>Licensee does not disconnect consumers. Examination of consumer records and accounts verified that disconnections do not occur.</p>
<p><b>Compliance summary</b></p> <p>Not rated</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

<p><b>Item 52 (52)</b> Trading Licence Clause 5.1</p>	<p>Compliance rating Not rated</p>
<p><i>Energy Coordination (Customer Contracts)Regulation 12(6) AGA Code Clause 5.2.2.2</i></p> <p>If a licensee is under an obligation to reconnect supply and the customer makes a request for reconnection after 3pm on a business day, the licensee use best endeavours to reconnect the customer as soon as possible on the next business day.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p> <p>Examined consumer records and accounts</p>	
<p><b>Observations</b></p> <p>As Licensee does not disconnect consumers, reconnects are not necessary. Examination of consumer records and accounts verified that reconnections do not occur.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item 53 (53)</b> Trading Licence Clause 5.1</p>	<p>Compliance rating Not rated</p>
<p><i>Energy Coordination (Customer Contracts)Regulation 13(1) AGA Code Clause 4.4.6.2</i></p> <p>If a licensee uses a refundable advance to offset an amount owed, it must provide to the customer an account of its use and pay any balance within 10 business days to the customer.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager</p> <p>Interviewed Team Leader Credit– Funds Management &amp; Reticulation</p> <p>Examined records and customer accounts</p>	
<p><b>Observations</b></p> <p>Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur.</p>	

<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 54 (54)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 13(3)</i>	
A licensee must place refundable advances in separate trust accounts and separately identify the amounts in its accounting records.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Interviewed Team Leader Credit– Funds Management & Reticulation	
Examined records and customer accounts	
<b>Observations</b>	
Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 55 (55)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 13(4)</i>	
A licensee must return interest earned on refundable advances accounts to customers.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
Interviewed Team Leader Credit– Funds Management & Reticulation	
Examined records and customer accounts	
<b>Observations</b>	
Licensee does not require a refundable advance. Examination of consumer records and accounts verified that refundable advances do not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 56 (56)</b> Trading Licence Clause 5.1	Compliance rating Compliant-4
<p><i>Energy Coordination (Customer Contracts)Regulation 14(2)</i></p> <p>A licensee must inform customers that the supply charge is either for residential or non residential supply; includes a specified fixed component and specified usage component; and describes the circumstances a customer needs to meet to qualify for residential tariffs.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Team Leader Credit– Funds Management &amp; Reticulation</p>	
<p><b>Observations</b></p> <p>The small use gas supply agreement terms and conditions contains an explanation on the supply charge and only relates to residential customers.</p> <p>The contract for the non-residential customer sets out the gas cost and the meter rental charge and as such does not contain a supply charge.</p>	
<p><b>Compliance summary:</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Information on the makeup of the supply charge to be provided on the bill or in the terms and conditions document.</p>	

<b>Item 57 (57)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant -2
<p><i>Energy Coordination (Customer Contracts)Regulation 14(3) AGA Code Clause 4.1.2.1 &amp; 4.1.2.2</i></p> <p>A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting Team Leader Reticulation and Team Leader Credit– Funds Management &amp; Reticulation</p> <p>Examined records and customer accounts</p>	
<p><b>Observations</b></p> <p>The customer is not provided with a notice that provides information on the tariff charged.</p> <p>No request was received from a customer during the audit period for information on the tariff charged.</p>	
<p><b>Compliance summary:</b></p> <p>Non compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Customer to be provided with notice describing the tariff charged at the time of becoming a customer and each time the tariff changes.</p>	

<b>Item 58 (58)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 14</i> AGA Code Clause 4.1.3.1 & 4.1.3.2	
A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit– Funds Management & Reticulation	
<b>Observations</b>	
No change occurred to the tariff during the audit period However changes that have occurred in the past have not been communicated to the customer other than when they are applied to the Bill.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	
Process to be put in place to give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	

<b>Item 59 (59)</b> Trading Licence Clause 5.1	Compliance rating Complaint - 5
<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code Clause 4.2.1	
A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit– Funds Management & Reticulation	
Examined billing process and accounts	
<b>Observations</b>	
Bill sent every two months to residential customers and every month to business customers.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 60 (60)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant-1
<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3	
A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management &	

Reticulation. Examined a cross section of customer bills dating from October 2008 to February 2011 to confirm that the format had not changed during this period.
<b>Observations</b> The bill format and information contained in the bill has not changed since October 2008 apart from the inclusion of a telephone number for TTY and still does not contain all the information required in the AGA code.
<b>Compliance summary</b> Non-compliant
<b>Corrective Action/Opportunity for Improvement</b> The bill format to be revised to comply with the requirements of the AGA code.

<b>Item 61 (61)</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code Clause 4.2.3.2 A licensee must apply payments received from a customer as directed by the customers (if the bill includes charges for other goods and services).	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined a number of customer bills	
<b>Observations</b> The Licensee does not include any goods or services charges on the bill.	
<b>Compliance summary</b> Not applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 62 (62)</b> Trading Licence Clause 5.1	Compliance rating Not applicable
<i>Energy Coordination (Customer Contracts) Regulation 15(1) &amp; 15(2)</i> If a customer does not direct how a payment is to be allocated, a licensee must apply the payment: (i) To charges for the supply of gas before applying any portion of it to such goods or services; or (ii) If such goods or services include electricity, to the charges for gas and the charges for electricity in equal proportion before applying any portion of it to any other such goods or services.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined customer bills.	
<b>Observations</b> As no charges for goods and services occur all payments are allocated to the charges associated	

with supplying the gas.
<b>Compliance summary</b> Not applicable
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 63 (63)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 15(1), 47(2) &amp; (4)</i> AGA Code Clause 4.2.3.4 A licensee must provide available bill data to customers upon request free of charge subject to clause 47 (2) and (4) of the Energy Coordination (Customer Contracts) Regulations 2004.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined customer database	
<b>Observations</b> No request for bill data has been received during the audit period. Should the licensee be requested to provide the above data the licensee confirmed it would be made available free of charge. The examination of the database confirmed the data is available.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 64 (64)</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code Clause 4.2.4.1 A licensee must base a customer's bill on a meter reading and meters must be read at least once per year.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined bills and customer database.	
<b>Observations</b> Licensee reads the meter once every two months and the bill is based on meter readings.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 65 (65)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.2</i>	
A licensee, who accepts a customer reading of the meter, must not adjust the bill in favour of the licensee if the licensee subsequently discovers the reading was incorrect in favour of the customer.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
During the audit period reading of the meter by the customer did not occur. It is the policy of the licensee not to allow customers to read the meter for billing purposes. If a special reading is required the licensee arranges for a reading at no cost to the customer.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 66 (66)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.4</i>	
A licensee, who provides a customer with an estimated bill and is subsequently able to read the meter, must adjust the estimated bill in accordance with the meter reading.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
Examined customer bills	
Examined database	
<b>Observations</b>	
The policy of the licensee is not to estimate bills and no evidence was found that estimated bills were provided during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 67 (67)</b> Trading Licence Clause 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.2.4.5</i>	
A licensee must read a customer's meter upon request and may impose a fee for doing so.	

<b>Verification/Tests</b>
Interviewed Acting Team Leader Reticulation
<b>Observations</b>
No customer requests for a meter read occurred during the audit period. However should a request be received the reading would be carried out at no charge.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 68 (68)</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.3.2.1</i> A licensee must offer payment in person and payment by mail.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined bill	
<b>Observations</b>	
The Bill clearly states the payment options available which include payment in person and payment by mail	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 69 (69)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 15(1)AGA Code Clause 4.3.2.2</i> A licensee must offer customers who are absent for a long period, payment in advance facilities and the option of redirecting the bill.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
No request for payment in advance and redirection of the bill was received during the audit period. However, processes exist for the licensee to offer the above options if requested by a customer.	
<b>Compliance summary</b>	

Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 70 (70)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 16(3)</i>	
A licensee must not terminate a contract if a customer commits a breach of the contract (other than a substantial breach) unless —	
<ul style="list-style-type: none"> <li>(a) The licensee has a right to disconnect supply under the contract, a written law or a relevant code; and</li> <li>(b) The licensee has disconnected supply at all supply addresses of the customer covered by the contract.</li> </ul>	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
No contracts were terminated during the audit period. The policy of the licensee is not to terminate contracts in any circumstance.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	
Consideration to be given to documenting this policy.	

<b>Item 71 (71)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts) Regulation 19</i>	
A licensee must provide a customer	
<ul style="list-style-type: none"> <li>(a) A copy of their customer service charter;</li> <li>(b) Copies of regulations or any relevant code;</li> <li>(c) Information about fees and charges payable under the contract;</li> <li>(d) With information on energy efficiency;</li> <li>(e) Billing data; and</li> <li>(f) With information on Government Assistance Programs and Financial Counselling Services if requested by the customer.</li> </ul>	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
No requests occurred for the above information during the audit period. However, the above information is readily available from the licensee and would be provided if requested by a customer.	

<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 72 (72)</b> Trading Licence Clause 5.1	Compliance rating Compliant-4
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination (Customer Contracts)Regulation 20(2)</i> AGA Code Clause 4.3.5.1 A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined customer database	
<b>Observations</b> Licensee provides a number of options including those required under regulation 20(2) and works with the customer to assist them in managing payment of their account. Record of action taken contained in customer database in the diary notes section. The action taken is left to the discretion of the Team Leader Credit – Funds Management & Reticulation after discussion with the customer and when possible in line with their wishes.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b> Process needs to be documented.	

<b>Item 73 (73)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant -2
<i>Energy Coordination (Customer Contracts)Regulation 27(4) &amp; 40(3)</i> A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.	
<b>Verification/Tests</b> Interviewed the Retail and Marketing Manager	
<b>Observations</b> A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b> Non-compliant	

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOG and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved, including the action to be taken if a customer query's a contract.

<b>Item 74 (74)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 20(3) &amp; 48</i>	
A licensee must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
No legal action occurred during the audit period. The policy of the licensee is not to take legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 75 (75)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 22 &amp; 49(2)</i>	
A licensee must only provide a credit reporting agency with default information relevant to one of their bills.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
No information was provided to a credit reporting agency during the audit period. However, the licensee has processes in place to provide a credit reporting agency with default information relevant to one of their bills if required.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 76 (76)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(3)</i>	

A licensee must notify a credit reporting agency immediately if a customer has cleared their debt.
<b>Verification/Tests</b> Interviewed Team Leader Credit – Funds Management & Reticulation
<b>Observations</b> The licensee did not notify a credit reporting agency that a customer had cleared their debt during the audit period as no instances of this type occurred. However, the licensee has a process in place to notify a credit reporting agency immediately if a customer has cleared their debt.
<b>Compliance summary</b> Not rated.
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 77 (77)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(4)</i> If a customer remedies a default and demonstrates extenuating circumstances, a licensee must request the credit reporting agency to remove the default record.	
<b>Verification/Tests</b> Interviewed Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b> The licensee did not make any requests to a credit reporting agency during the audit period to remove a customer's default record as no instances of this type occurred. However, the licensee has a process if a customer remedies a default and demonstrates extenuating circumstances, to request the credit reporting agency to remove the default record.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 78 (78)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 49(5)</i> A licensee must not refer a default to a credit reporting agency that is the subject of a complaint or matter of review.	
<b>Verification/Tests</b> Interviewed Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b> No information was provided to a credit reporting agency during the audit period. However, the licensee has a process for not referring a default to a credit reporting agency that is the subject of a complaint or matter of review.	
<b>Compliance summary</b>	

Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 79 (79)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 50</i>	
A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.	
<b>Verification/Tests</b>	
Interviewed Acting team Leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
Policy of licensee not to disconnect, therefore this circumstance would not eventuate.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 80 (80)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant - 2
<i>Energy Coordination (Customer Contracts)Regulation 44</i>	
When a non-standard contract is due to expire a licensee must issue a notice in writing to a customer between 1 and 2 months prior to the expiry date (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
Examined non-standard contract for the only business customer.	
<b>Observations</b>	
The only non standard contract expired during the audit period and was renewed but the above process was not followed. No notice in writing was provided to the customer prior to the existing contract expiring. The renewal of the contract was discussed with the customer and the details of the new contract agreed and a contract was signed by the customer.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
Licensee to implement a process that ensures the customer is provided with the information specified above in the required time frame.	

<b>Item 81 (81)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts)Regulation 45(1)</i> Upon request, a licensee must provide a customer free of charge with a copy of its customer service charter within 2 business days of the request.	
<b>Verification/Tests</b> Interviewed the Reticulation Manager Examined customer charter on website.	
<b>Observations</b> The charter is available on the website and if requested the licensee would refer the customer to the website. In instances where the customer does not have access to the website the licensee would mail a copy of the charter. Although this process would be followed no requests occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 82 (82)</b> Trading Licence Clause 5.1	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts)Regulation 45(2)</i> A licensee must from time to time provide the customer with advice with their bill that a customer service charter is available free of charge.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation	
<b>Observations</b> During the audit period advice with their bill that a customer service charter is available free of charge has not been provided.	
<b>Compliance summary</b> Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b> Licensee to implement a process for providing advice with a customer's bill from time to time that a customer service charter is available free of charge. This should be achieved by including the information on the bill.	

<b>Item 83 (83)</b> Trading Licence Clause 5.1	Compliance rating Not rated
<i>Energy Coordination (Customer Contracts)Regulation 46(1)&amp; (2)</i> Upon request, a licensee must provide a customer with a copy of the <i>Gas Industry (Customer Contract) Regulations 2004</i> or a relevant code.	
<b>Verification/Tests</b>	

Interviewed Reticulation Manager
<b>Observations</b> No request for a copy of the <i>Gas Industry (Customer Contract) Regulations 2004</i> or a relevant code was received during the audit period. However, the licensee would provide a copy if requested.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 84 (84)</b> Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 46(4)</i> A licensee must ensure that a copy of the <i>Energy Coordination (Customer Contract) Regulations 2004</i> or a relevant code is available for inspection at its offices at no charge.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined a copy of <i>Energy Coordination (Customer Contract) Regulations 2004</i> and other legislative documents and industry codes.	
<b>Observations</b> Confirmed a copy of the <i>Energy Coordination (Customer Contract) Regulations 2004</i> or a relevant code is available for inspection at the licensee's offices at no charge.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 85</b> Trading Licence clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code</i> A standard form contract must include a provision that the retailer or distributor must provide, install and maintain equipment for the supply of gas up to the point of supply.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined small use gas supply agreement terms and conditions	
<b>Observations</b> Small use gas supply agreement terms and conditions contains a provision that the distributor provides, installs and maintains equipment for the supply of gas up to the point of supply	
<b>Compliance summary</b> Compliant	

**Corrective Action/Opportunity for Improvement**

<b>Item 86</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code</i>		
A standard form contract must include a provision that the retailer or distributor must provide, install and maintain metering and necessary equipment at the supply address.		
<b>Verification/Tests</b>		
Interviewed Reticulation Manager Examined small use gas supply agreement terms and conditions		
<b>Observations</b>		
Small use gas supply agreement terms and conditions contains a provision that the distributor provides, installs and maintains metering and necessary equipment at the supply address.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 90 (90)</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 33(3) AGA Code 3.5.2.2</i>		
A licensee must ensure that any representatives seeking access to the supply address on its behalf, wear, carry and show official identification.		
<b>Verification/Tests</b>		
Interviewed retail and Marketing Manager Examined licensee's official identity card		
<b>Observations</b>		
Identity card issued to all employees that require access to customer's property shows holder is representative of the licensee.		
<b>Compliance summary</b>		
Compliant		
<b>Corrective Action/Opportunity for Improvement</b>		

<b>Item 91 (91)</b>	Trading Licence Clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination (Customer Contracts) Regulation 42</i>		
A licensee must notify a customer of any amendment to a non-standard contract.		
<b>Verification/Tests</b>		

Interviewed Reticulation Manager
<p><b>Observations</b></p> <p>Licensee has only one business customer subject to a non-standard contract and the contract was renewed during the audit period and the customer was provided with a new contract setting out all the terms and conditions.</p>
<p><b>Compliance summary</b></p> <p>Compliant</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

## LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

Item 96 (96) Trading Licence Clause 18.	Compliance rating Compliant-5
<p><b>Licence:</b>        <i>Trading</i></p>	
<p><i>Energy Coordination Act section 11M</i></p> <p>The requirement is that a Licensee must comply and require its expert to comply with the <i>Authority's</i> standard guidelines dealing with the performance audit.</p>	
<p><b>Verification/Tests</b></p> <p>Auditor provided with a copy of the <i>Authority's</i> standard guidelines dealing with the performance audit.</p>	
<p><b>Observations</b></p> <p>The performance audit was carried out in compliance with the <i>Authority's</i> standard guidelines dealing with the performance audit.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

Item 97 (97) Trading Licence Clause 18.4	Compliance rating Compliant-5
<p><i>Energy Coordination Act section 11M</i></p> <p>A licensee's independent auditor must be approved by the Authority prior to the audit.</p>	
<p><b>Verification/Tests</b></p> <p>Examined letter from Authority confirming approval of auditor</p>	
<p><b>Observations</b></p> <p>Letter confirms that Authority approved the auditor</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

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<b>Item 98 (98)</b> Trading Licence Clause 19	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A licensee may be subject to individual performance standards.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
No individual performance standards were imposed during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 99 (99)</b> Trading Licence Clause 20	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.	
<b>Verification/Tests</b>	
Interviewed Acting team leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
Examined information provided to the customer	
<b>Observations</b>	
All notices are provided in writing.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 100 (100)</b> Trading Licence Clause 23.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting Standards.	
<b>Verification/Tests</b>	
Examined Annual Report of Licensee	

<b>Observations</b>
Annual Report states that accounting records comply with the required standards.
<b>Compliance summary</b>
Compliant.
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 101 (101)</b> Trading Licence Clause 24	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee must report to the <i>Authority</i> if the Licensee is under external administration or experiences a significant change in its corporate, financial or technical circumstances.	
<b>Verification/Tests</b>	
Interviewed Acting team leader Reticulation and Team Leader Credit – Funds Management & Reticulation	
<b>Observations</b>	
The Licensee has not been under external administration or experienced a significant change in its corporate, financial or technical circumstances during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 102 (102)</b> Trading Licence Clause 21.	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee must provide to the <i>Authority</i> any information that the <i>Authority</i> may require in connection with its functions under the <i>Energy Coordination Act 1994</i> in the time, manner and form specified by the <i>Authority</i> .	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
Examined performance report and the annual performance report	
Examined records to establish when delivery of the reports occurred	
<b>Observations</b>	
The licensee provided all information requested during the audit period within the required timeframe. This included the annual compliance report.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 103 (103)</b> Trading Licence Clause	Compliance rating Compliant -5
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee must publish any information it is directed by the <i>Authority</i> to publish, within the timeframes specified.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined 'performance report'	
<b>Observations</b>	
Licensee published a 'Performance Report' as per clause 13.15 of the Gas Customer Code on their website.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 106 (106)</b> Trading Licence Clause 12.2	Compliance rating Non-compliant -2
<i>Energy Coordination Act section 11M</i>	
A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.	
<b>Verification/Tests</b>	
Interviewed Acting team leader Reticulation and Team Leader Credit – Funds Management & Reticulation Examined records	
<b>Observations</b>	
The Authority formally requested the licensee to review their standard contract during the audit period. Examination of the licensee's records failed to find the letter sent by the Authority on 6 October 2009 regarding the need to review the standard contract. The licensee did not review the standard contract.	
<b>Compliance summary</b>	
Non compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	
Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.	

<b>Item 107 (107)</b> Trading Licence Clause 12.3	Compliance Rating Non-compliant-2
<i>Energy Coordination Act section 11M</i>	
A licensee must comply with any direction given by the Authority in relation to the scope, process	

and methodology of the standard form contract review.
<b>Verification/Tests</b> Interviewed Reticulation Manager
<b>Observations</b> The Authority formally requested the licensee to review their standard contract during the audit period. Examination of the licensee's records failed to find the letter sent by the Authority on 6 October 2009 regarding the need to review the standard contract. The licensee did not review the standard contract therefore the auditor has formed the view that the licensee did not comply with any direction given by the Authority in relation to the scope, process and methodology of the standard form contract review.
<b>Compliance summary</b> Non-compliant
<b>Corrective Action/Opportunity for Improvement</b> Licensee to put in place a process to ensure any direction from the Authority is recorded and the action required completed within the required timeframe and a record of the action taken is retained.

<b>Item 108 (108)</b> Trading Licence Clause 13.1	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee must only amend the standard form contract in accordance with the Energy Coordination Act 1994 and Regulations.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined records	
<b>Observations</b> Although the licensee was directed to review the standard form contract, no amendment of the standard form contract occurred during the audit period. As the standard form contract was not reviewed no amendment in accordance with the Energy Coordination Act 1994 and Regulations occurred during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 109 (111)</b> Trading Licence clause 15.1 and 15.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A licensee must maintain supply to a customer if it supplies, or within the last 12 months supplied, gas to that customer's premises unless another supplier starts supplying the customer.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b>	

Licensee is the only retailer supplying gas from this reticulation system and as supply is maintained continuously disconnections are not carried out.

**Compliance summary**

As no disconnections occur and no other supplier exists licensee complies with this obligation.

<b>Item 110 (112)</b> Trading Licence Schedule 3 Clause 1.5	Compliance rating Not rated
<p><i>Energy Coordination Act section 11M</i></p> <p>The requirement is that a Licensee must provide the <i>Authority</i> within 3 business days of a request by the <i>Authority</i> with reasons for refusing to commence supply to a customer if requested by the <i>Authority</i>.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting team leader Reticulation and Team Leader Credit – Funds Management &amp; Reticulation</p>	
<p><b>Observations</b></p> <p>No requests of this nature occurred during the audit period. However, should the licensee receive a request by the Authority it would comply with the request in the required time frame.</p>	
<p><b>Compliance summary</b></p> <p>Not rated.</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<b>Item 111 (113)</b> Trading Licence Schedule 3 Clause 1.7	Compliance rating Not rated
<p><i>Energy Coordination Act section 11M</i></p> <p>The requirement is that a Licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Acting team leader Reticulation and Team Leader Credit – Funds Management &amp; Reticulation</p> <p>Examined records</p>	
<p><b>Observations</b></p> <p>No directions of this nature occurred during the audit period. . However, should the licensee receive a direction from the Authority it would comply with the request in the required time frame.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<b>Item 112 (114)</b> Trading Licence Schedule 3 Clause 2.1 to 2.2	Compliance rating Compliant-5
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<i>Energy Coordination Act section 11M</i>
A licensee must provide reasonable information relating to its activities under the licence as requested by the holder of a distribution licence to enable for the safe and efficient operation of the relevant distribution system, provided such disclosure does not prejudice the commercial interests of the licensee.
<b>Verification/Tests</b>
Interviewed Manager Reticulation
<b>Observations</b>
As the same company hold both licences information flows freely between the retailer and the distributor.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 113 (115) Trading Licence Schedule 3 Clause 3.1</b>	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A Licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
<b>Observations</b>	
No change to any price, price structure, fee or interest rate under the standard form contract occurred during the audit period.	
It is also understood that any Consumer price Index (CPI) increase to tariffs must also be notified to the Minister. However, no CPI increases occurred during the audit period.	
<b>Compliance summary</b>	
Not rated.	
<b>Corrective Action/Opportunity for Improvement</b>	
The licensee to put in place a process for notifying the Minister directly as all previous notifications to the Minister have been provided by the Authority on behalf of the licensee.	

## LICENCE COMPLIANCE REQUIREMENTS – GAS MARKETING CODE OF CONDUCT

<b>Item 114 (116) Trading Licence Clauses 19.1</b>	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP</i>	
The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.	

<b>Verification/Tests</b>
Interviewed the Retail and Marketing Manager
<b>Observations</b>
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item 115 (117)</b> Trading Licence clause 19.2	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M and 11ZPP</i>	
A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 116 (118)</b> Trading Licence Clause 19.1	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i>	
A marketer must ensure that its marketing representatives comply with Part 2 of the Code of Conduct.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	

<b>Observations</b>
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item117 (120)</b> TradingLicenceClause19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)</i>	
A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item 118</b> Trading Licence clause 19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)</i>	
A marketing representative must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	

<b>Observations</b>
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item 119 (121)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<b>Licence:</b> <i>Trading</i>	
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)</i>	
Where a standard form contract is not entered into as a result of door to door marketing or for a non-standard contract initiated by telephone, a marketing representative must obtain and make a record of the customer's verifiable consent that the specified information has been given.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item120 (122)</b> TradingLicenceClause19	Compliance rating Non- Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(3)</i>	
Where a standard form contract is entered into as a result of door to door marketing or for a non-standard contract (other than that initiated by the customer by telephone or electronic means), a marketing representative must obtain the customer's written acknowledgement that the specified information has been given.	

<b>Verification/Tests</b>
Interviewed the Retail and Marketing Manager
<b>Observations</b>
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item121 (123)</b> TradingLicenceClause19	Compliance rating Compliant-4
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)</i>	
Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must offer to provide the customer with a copy of the contract and, where this offer is accepted by the customer, provide a copy of the contract at that time or as soon as possible thereafter.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined small use gas supply agreement terms and conditions	
<b>Observations</b>	
The welcome letter sent to a customer provides for the customer to obtain a copy the small use gas supply agreement terms and conditions. During the audit period no request was received from a customer for a copy of the contract. However, should a request be received for a copy it would be provided either electronically or by post that day.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item122 (124)</b> TradingLicenceClause19	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i>	
Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Manager Retail and Marketing	

<b>Observations</b>
Information required under the Gas Marketing Code of Conduct is not provided.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
<p>Licensee to provide the following information as required under the Gas Marketing Code of Conduct:</p> <p>(a) How the <i>customer</i> may obtain –</p> <ul style="list-style-type: none"> <li>(i) a copy of the <i>retailer's Customer Service Charter</i>;</li> <li>(ii) a copy of the <i>Code</i>; and</li> <li>(iii) details on all relevant tariffs, fees, charges, <i>alternative tariffs</i> and service levels that may apply to the <i>customer</i>;</li> </ul> <p>(b) The scope of the <i>Code</i>;</p> <p>(c) That a <i>retailer, distributor, marketer</i> and <i>marketing representative</i> must comply with the <i>Code</i>;</p> <p>(d) How the <i>retailer</i> may assist if the <i>customer</i> is experiencing <i>payment difficulties</i> or <i>financial hardship</i>;</p> <p>(e) The <i>concessions</i> that may apply to the <i>customer</i>;</p> <p>(f) The <i>distributor's</i> 24 hour telephone number for faults and emergencies;</p> <p>(g) How the <i>customer</i> may access the <i>retailer's</i>:</p> <ul style="list-style-type: none"> <li>(i) multi-lingual services (in languages reflective of the <i>retailer's customer</i> base); and</li> <li>(ii) <i>TTY</i> services;</li> </ul> <p>(h) How to make an enquiry of, or <i>complaint</i> to, the <i>retailer</i>;</p> <p>(i) General information on the <i>retailer's gas customer safety awareness programme</i>; and</p> <p>(j) The details of any right the <i>customer</i> may have to rescind the <i>contract</i> during a <i>cooling-off period</i> and the charges that may apply if the <i>customer</i> rescinds the <i>contract</i>.</p>

<b>Item123 (125)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(3)</i>	
In circumstances where a standard form contract is not entered into as a result of door to door marketing, a retailer or marketing representative must give the specified information no later than with or on the customer's first bill and a copy of the contract if requested by the customer (and the customer has not previously received a copy).	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	

Non-compliant
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>

<b>Item 124 (126)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(4)</i></p> <p>In circumstances where a standard form contract is entered into as a result of door to door marketing or a non-standard contract, a retailer or marketing representative must give the specified information and a copy of the contract before the customer has entered into the contract and must obtain a written acknowledgement that the information has been given.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed the Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	

<b>Item 125 (127)</b> TradingLicenceClause19	Compliance rating Non-compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i></p> <p>A marketing representative must not, when marketing, engage in conduct that is misleading, deceptive or likely to mislead or deceive or that is unconscionable.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed the Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item126 (128)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)</i>	
A marketing representative must not exert undue pressure on a customer, nor harass or coerce a customer.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item127 (129)</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(3)</i>	
A marketing representative must ensure that the inclusion of concessions is made clear to customers and any prices that exclude concessions are disclosed.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
No concessions are offered by the licensee.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item128 (130)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(4)</i>	
A marketing representative must ensure that all standard form contracts that are entered into as a result of door to door marketing and all non-standard contracts are in writing.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item129 (131)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(5)</i>	
A marketer must ensure that a customer is able to contact the marketer on the marketer's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item130 (132)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(1)</i>	
A marketing representative must provide the information specified to the customer when marketing by means other than face to face and after having identified the purpose of the contact, if the contact is not by electronic means, the marketing representative must ask the customer whether they wish to proceed further.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item131 (133)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(2)</i>	
A marketing representative must, on request, provide the customer with its' and the retailer's complaints telephone number and marketing identification number.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item132 (134)</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(3)</i>	
A marketing representative who meets with a customer face to face must:	
<ul style="list-style-type: none"> <li>a) As soon as practicable tell the customer the purpose of the visit;</li> <li>b) Wear a clearly visible and legible identity card showing the information specified; and</li> <li>c) As soon as practicable provide the information specified in writing to the customer.</li> </ul>	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
No marketing has been performed face to face in respect of the reticulation systems during the audit period. The practice of the licensee is not to meet the customer face to face to conduct any marketing activities.	
<b>Compliance summary</b>	
Not rated.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item133 (135)</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(4)</i>	
If, when marketing to a customer, the customer indicates that they wish to end the contact, the marketing representative must end the contact as soon as practicable and not attempt to contact the customer for the next 30 days unless the customer agrees otherwise.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC. No requests were received from customers indicating they wished to end the contract during the marketing phase.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.	

<b>Item134 (136)</b> TradingLicenceClause19	Compliance rating Compliant -5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(5)</i>	

Unless requested by the customer, a marketing representative must not make contact with a customer outside the permitted call times, unless the contact is by electronic means or the contact arises outside the customer's premises in circumstances where the customer initiates contact.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

All contact outside the permitted call times has been by electronic means.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

<b>Item135 (137)</b> TradingLicenceClause19	Compliance rating Compliant-5
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*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(6)*  
 A marketing representative must ensure that contact for the purposes of marketing does not continue for more than 15 minutes past the end of the permitted call times without the customer's verifiable consent unless the contact is by electronic means.

**Verification/Tests**  
 Interviewed the Retail and Marketing Manager

**Observations**  
 All contact has been in accordance with the above requirements.

**Compliance summary**  
 Compliant

**Corrective Action/Opportunity for Improvement**

<b>Item136 (138)</b> TradingLicenceClause19	Compliance rating Non-Compliant -1
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*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6(7) & 2.6(8)*  
 Except in response to a customer request or query, a marketer must keep the specified records each time it initiates contact with a customer for the purposes of marketing.

**Verification/Tests**  
 Interviewed the Retail and Marketing Manager

**Observations**  
 A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.  
 The required records are not kept.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

The licensee to implement a process to record the information required under clause 2.6(7) and 2.6(8).

**Item137 (139)** TradingLicenceClause19

Compliance rating

Non-compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(1)*

Where the customer requests not to be contacted for the purposes of marketing a marketer must ensure that a customer is not contacted on its behalf in relation to the supply of gas for a period of two years unless:

- The customer requests contact; or
- The customer has moved premises; or
- A marketer has a legal obligation to contact the customer.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

**Item138 (140)** TradingLicenceClause19

Compliance rating

Non-Compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(2)*

A marketer must keep a record of each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC. The recording of the above information is also not undertaken.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.

**Item139 (141)** TradingLicenceClause19

Compliance rating  
Non-compliant -1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(3)*

A marketer must give a copy of the record to the Gas Ombudsman or the Authority on request.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

As no records are kept the licensee would be unable to provide a copy to the Gas Ombudsman or the Authority if requested.

**Compliance summary**

Significant non- compliance.

**Corrective Action/Opportunity for Improvement**

Licensee to implement a process to record each customer who has requested not to be contacted, that includes the name, address and telephone number of the customer at the time the customer made the request to enable the required information to be provided to the Gas Ombudsman or the Authority on request.

**Item140 (142)** TradingLicenceClause19

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(4)*

A marketer must provide the customer on request with written confirmation that the customer will not be contacted for the next two years.

**Verification/Tests**

Interviewed the Retail and Marketing Manager

**Observations**

A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the

licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item141 (143)</b> TradingLicenceClause19	Compliance rating Not rated
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.7(5)</i>	
A marketing representative must comply with a notice on or near the premises indicating that the customer does not wish to receive unsolicited mail or other marketing information.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
No direct door to door marketing has been performed in respect of the reticulation systems during the audit period therefore this obligation has not occurred.	
<b>Compliance summary</b>	
Not rated.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item142 (144)</b> TradingLicenceClause19	Compliance rating Compliant-5
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.8</i>	
A retailer and a marketer must comply with the National Privacy Principles as set out in the Privacy Act 1998 in relation to information collected under Part 2 of the Code of Conduct.	
<b>Verification/Tests</b>	
Interviewed the Retail and Marketing Manager	
<b>Observations</b>	
All employees complete training in the requirements of the National Privacy Principles as set out in the Privacy Act 1998 in relation to information collected under Part 2 of the Code of Conduct and are required to comply with the requirements. Examination of records confirmed no complaints were received during the audit period in relation to breaches of the Privacy Act.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item143 (145)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(1)</i></p> <p>A marketer must keep a record of each complaint made by a customer or a person contacted for the purposes of marketing and, on request, gives all information relating to the complaint to the Gas Ombudsman.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed the Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	

<b>Item144 (146)</b> TradingLicenceClause19	Compliance rating Non-Compliant-1
<p><i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i></p> <p>A marketer must keep a record or other information required by the Code to be kept for at least 2 years.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed the Retail and Marketing Manager</p>	
<p><b>Observations</b></p> <p>A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.</p>	

## LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

<b>Item145 (147)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
If a retailer agrees to sell gas to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the relevant distributor.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
This happens automatically as the retailer and distributor are the same company.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item146 (148)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must forward the customer's request for the connection to the relevant distributor in the timeframe specified unless the customer agrees otherwise.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
This happens automatically as the retailer and distributor are the same company. Therefore time frame is always achieved.	
<b>Compliance summary</b>	
Compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item147 (149)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must issue a bill no more than once a month and at least once every three months unless the circumstances specified exist.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader	
Examined bills.	
<b>Observations</b>	

Customers are issued a bill every two months and during the audit period no exceptions from this period frequency occurred.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

**Item148 (150)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 4.2(2)

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

A retailer may only place a residential customer on a shortened billing cycle, without the customer's verifiable consent, in the circumstances specified.

**Verification/Tests**

Interviewed Acting Team Leader Reticulation

Examined gas bills

Examined billing data base.

**Observations**

No customer was placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item149 (151)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 4.2(3)

Compliance rating  
Not rated

*Energy Coordination Act section 11M*

A retailer must give the customer written notice of a decision to shorten the customer's billing cycle within 10 business days of making the decision.

**Verification/Tests**

Interviewed Acting Team Leader Reticulation

Examined bills

Examined billing data base.

**Observations**

No customer placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item150 (152)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
Examined bills	
Examined billing data base.	
<b>Observations</b>	
No customer placed on a shortened billing cycle during the audit period It is not the policy of the licensee to place customers on a shortened billing cycle.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item151 (153)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(5)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must return a customer, who is subject to a shortened billing cycle and has paid three consecutive bills by the due date, on request, to the billing cycle that previously applied to the customer.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
Examined bills	
Examined billing data base	
<b>Observations</b>	
No customer placed on a shortened billing cycle during the audit period. It is not the policy of the licensee to place customers on a shortened billing cycle.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item152 (154)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(6)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must inform a customer, who is subject to a shortened billing cycle, at least once every three months, of the conditions upon which a customer can be returned to its previous billing cycle.	

<b>Verification/Tests</b>
Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base
<b>Observations</b>
No customer placed on a shortened billing cycle during the audit period It is not the policy of the licensee to place customers on a shortened billing cycle.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item153 (155)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
In respect of any 12 month period, on receipt of a request by a customer, a retailer may provide a customer with estimated bills under a bill smoothing arrangement.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base	
<b>Observations</b>	
During the audit period no customers where provided with estimated bills under a bill smoothing arrangement. It is not the policy of the licensee to provide a customer with estimated bills under a bill smoothing arrangement.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item154 (156)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
If a retailer provides a customer with estimated bills under a bill smoothing arrangement the retailer must ensure that the conditions specified are met.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base	
<b>Observations</b>	

During the audit period no customers were provided with estimated bills under a bill smoothing arrangement. It is not the policy of the licensee to provide a customer with estimated bills under a bill smoothing arrangement.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

**Item155 (157)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 4.4

Compliance rating  
Compliant-5

*Energy Coordination Act section 11M*

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.

**Verification/Tests**

Interviewed Acting Team Leader Reticulation

Examined bills

Examined billing data base

**Observations**

Examination of the billing data base confirmed that bills on the request of the customer have been sent to another address or an electronic address.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

**Item156 (158)** Trading Licence clause 2.1 and Schedule 2 Gas  
Customer Code clause 4.5(1)

Compliance rating  
Non-compliant-1

*Energy Coordination Act section 11M*

A retailer must include minimum prescribed information on the customer's bill, unless the customer agrees otherwise.

**Verification/Tests**

Interviewed Acting Team Leader Reticulation

Examined bills

Examined billing data base

**Observations**

Examination of bills sent at different times during the audit period has shown that a number of the prescribed information items are not included in the bill.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

The bill to be amended to include the minimum prescribed information required by the code as follows:

1. Information on refundable advances.
2. The availability of interpreter services.
3. Availability of the customer charter.
4. Availability of and cost of meter accuracy tests.
5. The amount of credit or arrears. (This is currently done via a statement only).

<b>Item157 (159)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must advise the customer of the amount of historical debt and its basis before, with or on the customer's next bill, if the retailer wishes to bill the customer for the historical debt.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit and Funds Management	
Examined bills	
Examined billing data base	
<b>Observations</b>	
Historical debt is provided on a statement that is issued 30 days after the bill has been sent. It is not included in the information provided on the bill. The bill only relates to the cost of gas consumed during the billing period. Historical debt only appears on the statement that would continue to be sent 30 days after each bill until the debt is cleared or dealt with by other means (such as instalments).	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
Consider including historical debt on bill.	

<b>Item158 (160)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must base the customer's bill on the distributors or metering agent's reading of the meter, or the customer's reading of the meter in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team Leader Credit and Funds Management	
Examined bills	
Examined billing data base	
<b>Observations</b>	
Examination of a number of bills showed that all bills are always based on a metering agent's reading of the meter.	
<b>Compliance summary</b>	
Compliant	

**Corrective Action/Opportunity for Improvement**

<b>Item159 (161)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give the customer information that explains to that customer how to read a meter correctly (if applicable) in clear, simple and concise language.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Examined Licensee's website.	
<b>Observations</b> Page 16 of the Licensee's Customer Charter provides detailed information on how to read a gas meter. Information on reading the meter is also included in the Safety Awareness & Information for Customers using Reticulated Gas brochure provided in the welcome pack sent to all new customers.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item160 (162)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.7	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must use its best endeavours to ensure that metering reading data is obtained as frequently as is required to prepare its bills and, in any event, at least once every twelve months in accordance with clause 4.6(1)(a) of the Gas Customer Code.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base	
<b>Observations</b> Licensee's policy is to read the meter every two months and the Licensee will undertake if necessary repeated visits to a dwelling to obtain a reading.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item161 (163)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base	
<b>Observations</b> No estimated bills provided during the audit period. It is not the policy of the licensee to issue estimated bills. All bills are based on the actual readings collected by the licensee or his agent.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item162 (164)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must specify the stated information in circumstances where the customer's bill is estimated.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Examined bills Examined billing data base	
<b>Observations</b> No estimated bills provided during the audit period. Not licensee's policy to provide estimated bills.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item163 (165)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must tell a customer, on request, the basis and reason for the estimation.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation	

Examined bills
Examined billing data base
<b>Observations</b>
No estimated bills provided during the audit period. Not licensee's policy to provide estimated bills.
<b>Compliance summary</b>
Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item164 (166)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.9	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
Where the 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.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
Examined bills	
Examined billing data base	
<b>Observations</b>	
No estimated bills provided during the audit period. Not licensee's policy to provide estimated bills.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item165 (167)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.10	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must replace an estimated bill with a bill based on an actual reading if the customer satisfies the requirements as specified.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
Examined bills	
Examined billing data base	
<b>Observations</b>	
No estimated bills provided during the audit period. Not licensee's policy to provide estimated bills.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

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<b>Item166 (168)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must request the distributor or metering agent to test the meter if a customer requests the meter to be tested and pays any reasonable charge of the retailer for testing the meter.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
No requests for a meter to be tested were received from a customer during the audit period. However, should a request be received the request will be forwarded to the distributor to enable the test to be carried out.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item167 (169)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	
<b>Observations</b>	
No requests for a meter to be tested were received from a customer during the audit period. The distributor does not charge for testing meters.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item168 (170)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.12(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
If a retailer offers alternative tariffs, a retailer must change the customer to an alternate tariff within the period specified if the customer applies to receive an alternate tariff and demonstrates to the retailer that the Customer satisfies the conditions of eligibility.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation	

Interviewed Retail and Marketing Manager
<b>Observations</b> No alternative tariffs are offered.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item169 (171)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.13	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the customer written notice prior to changing the customer to an alternative tariff if the customer's gas use has changed and the customer is no longer eligible to continue to receive an existing, more beneficial tariff.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Interviewed Retail and Marketing Manager	
<b>Observations</b> No alternative tariffs are offered.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item170 (172)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer may recover any amounts undercharged to a customer as a result of a change in the customer's gas use for the period of up to 12 months prior to the date on which the retailer provided notice in the specified manner.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b> No amounts were undercharged during the audit period and as a customer's meter is read every two months, this situation would not occur.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item171 (173)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must repay any amounts overcharged to a customer as a result of a change in the customer's gas use.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No amounts overcharged during the audit period and as a customer's meter is read every two months, this situation would not occur.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item172 (174)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must use reasonable endeavours to arrange for a final bill if a customer requests the retailer to issue a final bill at the customer's supply address.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer billing database	
<b>Observations</b>	
Final bill issued on request from a customer and addressed to customer's supply address.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item173 (175)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must repay the customer any amount in credit at the time of account closure.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No occurrences of this type occurred during the audit period and are unlikely to occur as bills based on actual use-age in arrears.	
<b>Compliance summary</b>	
Not rated	

**Corrective Action/Opportunity for Improvement**

<b>Item174 (176)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.16	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must review the customer's bill on request by the customer, subject to the customer paying the lesser of the portion of the bill agreed to not be in dispute or an amount equal to the average of the customer's bill over the previous 12 months, and paying any future bills that are properly due.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer billing database	
<b>Observations</b>	
No review of bills occurred during the audit period. Should such a request be received the licensee would carry out the review.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item175 (177)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must follow the procedures specified if a review of a bill has been conducted and the retailer is satisfied that the bill is correct or incorrect (as applicable).	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No reviews of bills occurred during the audit period. If a review was carried out it would be in accordance with the requirements of the Gas Customer Code.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item176 (178)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must inform the customer of the outcome of the review of a bill as soon as practicable, but, in any event, within 20 business days from the date of receipt of the request for review.	
<b>Verification/Tests</b>	

Interviewed Team Leader Credit and Funds Management & Reticulation
<b>Observations</b> No reviews of bills occurred during the audit period. The customer would be informed of the outcome of a review within the required timeframe if a review was to occur.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item177 (179)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.18(2)	Compliance Rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must recover an amount undercharged as a result of an act or omission by a retailer or distributor in the manner specified.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation.	
<b>Observations</b> No amounts where undercharged during the audit period.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item178 (180)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must use its best endeavours to inform the customer (including a customer who has vacated the supply address) of an overcharge, and repay or credit any amount overcharged as a result of an act or omission by a retailer or distributor, in the manner and period specified.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b> No overcharges occurred during the audit period. However, the licensee has a process in place to cover such an event.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item179 (181)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No overcharges occurred during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item180 (182)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must use reasonable endeavours to credit the amount overcharged within 20 business days of the customer making the request, in circumstances where instructions as to payment are not received by the customer.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No overcharges occurred during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item181 (183)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
The due date on the bill must be at least 12 business days from the date of the bill, with the date of dispatch deemed to be the date of the bill, unless the retailer specifies a later date.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation.	
Interviewed Retail and Marketing Manager.	
Examined customer bills	
<b>Observations</b>	
After examining a number of bills that were issued during the audit period, concluded the format remained unchanged and that all bills have a due date of at least 21 days from the date the bill is	

issued.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item182 (184)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must as a minimum offer the specified payment methods to the customer.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation Interviewed Retail and Marketing Manager Examined bills	
<b>Observations</b> All the specified payment methods contained in the Gas Customer Code are included on the bill.	
<b>Compliance summary</b> Compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item183 (185)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must comply with the Electronic Funds Transfer Code of Conduct with respect to an electronic payment arrangement.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined Electronic Funds Transfer Form	
<b>Observations</b> Electronic payments are in accordance with Electronic Funds Transfer Code of Conduct and information is maintained in a hard copy file which includes the completed form signed by the customer.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item184 (186)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.3	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must, prior to commencing a direct debit, obtain the customer's verifiable consent and agree to the specified conditions for the direct debit.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined Electronic Funds Transfer Form and Customer records	
<b>Observations</b>	
The Electronic Funds Transfer Form used by the licensee requires the customer's signature and details on the direct debit. The form is easy to read and understand and in the opinion of the auditor passes the plain language test set out in the definition of verifiable consent in the Gas Customer Code. As part of establishing a direct debit the licensee follows a process that includes ensuring compliance with clause 5.3 of the Gas Customer Code.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item185 (187)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must accept payment in advance from a customer on request, in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation. Examined customer database	
<b>Observations</b>	
No payments in advance were received during the audit period. However, should such a request be received the licensee would accept the payment if the circumstances specified applied.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item186 (188)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.5	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must, at no charge, offer a residential customer a redirection of the customer's bill to a third person, if requested by a customer who is unable to pay by a minimum payment method, due to illness or absence.	
<b>Verification/Tests</b>	

Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> No requests of this type were received during the audit period. However, the licensee would redirect the bill if requested by the customer.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item187 (189)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer a late payment fee in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation. Examined customer database	
<b>Observations</b> No late payment fees have been charged other than in accordance with the prescribed requirements.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item188 (190)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer an additional late payment fee in relation to the same bill within five business days from the date of receipt of the previous late payment fee notice.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> Only one late payment fee is charged and this is specified on the statement that is sent out 30 days after the bill has been issued if payment has not been received.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

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<b>Item189 (191)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must not charge a residential customer more than three late payment fees in relation to the same bill.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b>	
Only one late payment fee is charged and this is specified on the statement that is sent out 30 days after the bill has been issued if payment has not been received. Statements continue to be issued for outstanding payments every month but do not include additional late payment fees.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item190</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(4)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must retrospectively waive any late payment fee charged, pursuant to a residential customer's last bill, prior to an assessment of financial hardship being made.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b>	
No assessments of financial hardship where undertaken during the audit period. The licensee would waive any late payment fee prior to an assessment of financial hardship being made.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item191 (192)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must not require a customer who has vacated a supply address to pay for gas	

consumed at the customer's supply address in the circumstances specified.
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> During the audit period customers have not paid for gas where the required notice has been given.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item192 (193)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must not require a customer who was evicted or otherwise required to vacate a supply address to pay for gas consumed at the customer's supply address in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> The licensee during the audit period has not received any advice that a customer has been evicted or otherwise required to vacate a supply address. Should such advice be received the licensee has a process in place to deal with this event.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item193 (194)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(4)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must not require a previous customer to pay for gas consumed at the supply address in the circumstances specified. A previous retailer must not require the customer to pay for gas consumed at the supply address in the circumstance specified. A retailer must not require the customer to pay for gas consumed at a disconnected supply address in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> During the audit period the licensee has not required a previous customer to pay for gas consumed	

at the supply address prior to the customer entering into a contract for gas supply. As the licensee's policy is not to disconnect customers no supply addresses were disconnected as part of the process of an address having a change in gas customer.

As the licensee is the only retailer the obligation relating to a previous retailer does not apply.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

<b>Item194 (195)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must comply with the Conduct Principles set out in the guideline on debt collection issued by the Australian Competition and Consumer Commission.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
Examined customer database	
<b>Observations</b>	
No proceedings for recovery of debt occurred during the audit period. However the licensee does comply with the above principles.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item195 (196)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must not commence proceedings for recovery of a debt in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
Examined customer database.	
<b>Observations</b>	
No proceedings for recovery of debt occurred during the audit period. The licensee complies with the above obligation.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item196 (197)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must not recover or attempt to recover a debt relating to a supply address from a person other than the customer with whom the retailer has or had entered into a contract for the supply of gas to that supply address.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database.	
<b>Observations</b>	
No proceedings for recovery of debt occurred during the audit period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item197 (198)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.9	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
Where a retailer and residential customer have entered into a dual fuel contract, or separate contracts for the supply of electricity and gas, the retailer must apply a payment received from a residential customer for charges for the sale of electricity or sale and supply of gas in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation Interviewed Retail and Marketing Manager	
<b>Observations</b>	
No dual contracts or separate contracts for the supply of electricity and gas exist.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item198 (199)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)	Compliance rating Compliant-4
<i>Energy Coordination Act section 11M</i>	
A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within three business days from when the residential customer informs a retailer that the customer is experiencing payment problems.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	

<p><b>Observations</b></p> <p>The assessment whether a residential customer is experiencing payment difficulties or financial hardship is done immediately the licensee is made aware by the customer that they are experiencing payment problems.</p> <p>The assessment will (once the hardship policy is implemented) be made in accordance with the policy.</p>
<p><b>Compliance summary</b></p> <p>Compliant</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>The assessment is left to the discretion of the Team Leader Credit and Funds Management &amp; Reticulation consideration should be given to documenting the process. Hardship Policy to be implemented and form part of the assessment process.</p>

<p><b>Item199 (200)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(2)</p>	<p>Compliance rating Compliant-5</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must give reasonable consideration to the information and advice specified when undertaking an assessment regarding payment difficulties or financial hardship.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Team Leader Credit and Funds Management &amp; Reticulation</p> <p>Examined customer database</p>	
<p><b>Observations</b></p> <p>The licensee always accepts that the customer is experiencing difficulty and will work with the customer or the relevant organisation representing the customer to find a solution that is acceptable to both parties.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item200 (201)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(3)</p>	<p>Compliance rating Not rated</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must advise a residential customer on request of the details of an assessment.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Team Leader Credit and Funds Management &amp; Reticulation</p> <p>Examined customer database</p>	
<p><b>Observations</b></p> <p>There have been no requests from a customer for details of an assessment. The licensee would if an assessment was carried out provide the customer details on request.</p>	
<p><b>Compliance summary</b></p>	

Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item201 (202)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer may not unreasonably deny a residential customer's request for a temporary suspension of actions in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b>	
There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. However, should such a situation occur the licensee would comply with the above requirements.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item202</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must allow a temporary suspension of actions for a period of at least 15 days.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b>	
There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. The licensee would comply with the required time period.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item203 (204)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	

A retailer must give reasonable consideration to a request by a residential customer in the manner specified to allow a relevant consumer representative organisation additional time to assess a residential customer's capacity to pay.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation  
Examined customer database

**Observations**

There have been no requests for a temporary suspension of actions whilst an assessment on the capacity to pay is carried out. However, should this situation occur the licensee would grant the additional time.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<p><b>Item204 (205)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3</p>	<p>Compliance rating Compliant-4</p>
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*Energy Coordination Act section 11M*

A retailer must offer the alternative payment arrangements, and advise the residential customers that additional assistance may be available, in circumstances where a residential customer is assessed as experiencing payment difficulties or financial hardship.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation  
Examined customer database

**Observations**

Alternative payment arrangements are offered and customers are if appropriate referred to Centrelink and other organisations that may be able to assist the customer in managing the debt. The licensee will after discussion with the customer accept payment arrangements nominated by the customer.

**Compliance summary**

Compliant

**Corrective Action/Opportunity for Improvement**

<p><b>Item205 (206)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(1)</p>	<p>Compliance rating Compliant-5</p>
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*Energy Coordination Act section 11M*

A retailer must offer a residential customer who is experiencing payment difficulties or financial hardship at least the specified payment arrangements.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database
<p><b>Observations</b></p> <p>The licensee offers the customer additional time to pay and fee free and interest free instalment plans</p> <p>As it is the policy of the licensee not to disconnect supply is continued during this time.</p>
<p><b>Compliance summary</b></p> <p>Compliant</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

<p><b>Item206 (207)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(2)</p>	<p>Compliance rating Compliant-5</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must take into account and specify the stated information and take the specified actions when offering an instalment plan to a residential customer experiencing payment difficulties or financial hardship.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Team Leader Credit and Funds Management &amp; Reticulation</p> <p>Examined customer database</p>	
<p><b>Observations</b></p> <p>The licensee when offering an instalment plan complies with all the requirements of the Gas Customer Code.</p>	
<p><b>Compliance summary</b></p> <p>Compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

<p><b>Item207 (208)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(1)</p>	<p>Compliance rating Not rated</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must give reasonable consideration to a request by a customer, or a relevant consumer representative organisation, for a reduction of the customer's fees, charges, or debt.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Team Leader Credit and Funds Management &amp; Reticulation</p> <p>Examined customer database</p>	
<p><b>Observations</b></p> <p>No requests of this nature where received during the audit period.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	

**Corrective Action/Opportunity for Improvement**

<b>Item208 (209)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Compliance rating Non-compliant-1
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*Energy Coordination Act section 11M*

In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its hardship policy referred to in clause 6.10(2)(d).

**Verification/Tests**

Interviewed Reticulation Manager

**Observations**

The licensee is unable to refer to any guidelines as it has still to finalise a hardship policy.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

Hardship policy to be finalised and implemented.

<b>Item209 (210)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.7	Compliance rating Not rated
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*Energy Coordination Act section 11M*

A retailer must give reasonable consideration to offering a customer an instalment plan or offering to revise an existing instalment plan, in circumstances where it is reasonably demonstrated to the retailer that the customer is unable to meet its previously elected payment arrangement.

**Verification/Tests**

Interviewed Team Leader Credit and Funds Management & Reticulation

Examined customer database

**Observations**

No customer requests were received by the licensee to offer an instalment plan or revise an existing instalment during the audit period. However, should such a request be received reasonable consideration would be given to the request by the licensee.

**Compliance summary**

Not rated

**Corrective Action/Opportunity for Improvement**

<b>Item210 (211)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.8	Compliance rating Compliant-5
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*Energy Coordination Act section 11M*

A retailer must advise the customer of the specified assistance information.
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database
<b>Observations</b> Customers are advised of the assistance available by the licensee once the licensee becomes aware that the customer is experiencing financial hardship.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 211 (212)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representative organisations.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	
<b>Observations</b> No advance payments occurred during the audit period. Customers experiencing difficulty are provided with a plan to clear the debt. Licensee will accept a payment in advance as required by the code but to date no such payments have been offered by a residential customer to the licensee.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 212 (213)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer may apply different minimum payment in advance amounts for residential customers experiencing payment difficulties or financial hardship and other customers.	
<b>Verification/Tests</b> Interviewed Team Leader Credit and Funds Management & Reticulation Examined customer database	

<p><b>Observations</b></p> <p>No advance payments occurred during the audit period. Customers experiencing difficulty are provided with a plan to clear the debt.</p> <p>Licensee will accept a payment in advance as required by the code but to date no such payments have been offered by a residential customer to the licensee.</p>
<p><b>Compliance summary</b></p> <p>Not rated</p>
<p><b>Corrective Action/Opportunity for Improvement</b></p>

<p><b>Item213 (214)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(1)</p>	<p>Compliance rating Non-compliant-1</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p>	
<p><b>Observations</b></p> <p>Hardship policy currently under development.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Hardship policy to be finalised and implemented.</p>	

<p><b>Item214 (215)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(2)</p>	<p>Compliance rating Non-compliant-1</p>
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must ensure that the hardship policy complies with the specified criteria.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p>	
<p><b>Observations</b></p> <p>Hardship policy currently under development.</p>	
<p><b>Compliance summary</b></p> <p>Non-compliant</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p> <p>Hardship policy to be finalised and implemented.</p>	

<p><b>Item215</b> Trading Licence clause 2.1 and Schedule 2</p>	<p>Compliance rating</p>
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Gas Customer Code clause 6.10(3)	Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must give residential customers, financial counsellors and relevant consumer representative organisations, details of the financial hardship policy, at no charge. The retailer must provide all residential customers experiencing financial hardship details of the hardship policy.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
Hardship policy to be completed.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
Hardship policy to be finalised and implemented.	

<b>Item216 (217)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(4)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the specified information related to the hardship policy.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
Record of specified information relating to the Hardship policy is not available as the policy is still to be completed.	
<b>Compliance summary</b>	
Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
On completion of the Hardship policy and its implementation the specified information required in the Gas Customer Code is to be recorded.	

<b>Item217</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must, unless notified in writing by the Authority, review its hardship policy at least annually and submit the review to the Authority within 5 business days after it is completed.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
The hardship policy has still to be completed by the licensee.	

<b>Compliance summary</b>
Non compliant
<b>Corrective Action/Opportunity for Improvement</b>
As part of the process of developing the hardship policy the licensee is to include a process for reviewing the policy and submitting it to the authority in the required time frame.

<b>Item218</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager	
<b>Observations</b>	
As the policy has yet to be finalised no review has taken place.	
<b>Compliance summary</b>	
Non compliant	
<b>Corrective Action/Opportunity for Improvement</b>	
The licensee is to have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	

<b>Item219 (218)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.11	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
No request for alternative payment arrangements from a business customer experiencing payment difficulties was received during the audit period. However, should such a request be received the licensee would consider the request.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item220 (219)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.1	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must give the customer a reminder notice, use its best endeavours to contact the customer and give the customer a disconnection warning, in the manner and timeframes specified, prior to arranging for disconnection of a customer's supply address for failure to pay a bill.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation Interviewed Acting Team Leader Reticulation	
<b>Observations</b>	
The licensee does not disconnect customers.	
<b>Compliance summary</b>	
Not rated.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item221 (220)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.2	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must not arrange for disconnection of a customer's supply address for failure to pay a bill in the circumstances specified.	
<b>Verification/Tests</b>	
Interviewed Team Leader Credit and Funds Management & Reticulation	
<b>Observations</b>	
The licensee does not disconnect customers.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item222 (221)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.3	Compliance rating Not Applicable
<i>Energy Coordination Act section 11M</i>	
In relation to dual fuel contracts or separate contracts for the supply of electricity and the supply of gas, a retailer must not arrange for disconnection of the residential customer's supply address for failure to pay a bill within 15 business days from arranging for disconnection of the residential customer's gas supply.	
<b>Verification/Tests</b>	
Interviewed Retail and Marketing Manager	
<b>Observations</b>	

No dual fuel contracts or separate contracts for the supply of electricity and the supply of gas exist.
<b>Compliance summary</b> Not applicable
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item223 (222)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must not arrange for the disconnection of a customer's supply address for denying access to the meter unless the conditions specified are satisfied.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> The licensee does not disconnect customers.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item225 (224)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.6	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> The licensee does not disconnect customers.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item226 (225)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must arrange for reconnection of the customer's supply address if the customer has	

remedied its breach, makes a request for reconnection, pays the retailer's reasonable charges (if any) or accepts an offer of an instalment plan for the retailer's reasonable charges.
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation
<b>Observations</b> The licensee does not disconnect customers therefore no reconnections occur.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item227 (226)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must forward the request for reconnection to the relevant distributor within the timeframe specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> The licensee does not disconnect customers therefore no reconnections occur.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item229 (228)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(1)	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M</i> A retailer must give notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b> No variation in tariffs took place during the audit period. However, the licensee does not have a process in place for giving notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified	
<b>Compliance summary</b> Non-compliant	

**Corrective Action/Opportunity for Improvement**

The licensee to ensure it has in place a process for giving notice of any variations in its tariffs to each of its customers affected by a variation, in the timeframes specified

<b>Item230 (229)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must give a customer on request, at no charge, reasonable information on the retailer's tariffs, including alternative tariffs (if any).	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b>	
No request for tariff information from customers occurred during the audit period. However, should a request be received the information would be provided.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item231 (230)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must give a customer the information requested on tariffs in the manner and within the timeframes specified.	
<b>Verification/Tests</b>	
Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation	
<b>Observations</b>	
No request for tariff information from customers occurred during the audit period.. However, should a request be received the information would be provided in the required time frame.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item232 (231)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must, on request, give a customer its billing data.	
<b>Verification/Tests</b>	

Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation
<b>Observations</b> No request for billing data received from a customer during the audit period. If requested the billing data would be provided to a customer.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item233 (232)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data at no charge in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation.	
<b>Observations</b> No request for billing data received from a customer during the audit period. The data would be provided at no cost to the customer.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item234 (233)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(3)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data within 10 business days of the receipt of the request or payment of the retailer's reasonable charge for providing the billing data.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation.	
<b>Observations</b> No request for billing data received from a customer during the audit period. The licensee would comply with the required time frame.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 235 (234)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(4)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must keep a customer's billing data for seven years.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation Examined customer database.	
<b>Observations</b> All billing data is kept indefinitely in a database and can be accessed readily.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 236 (235)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.3	Compliance rating Not Applicable
<i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, the concession information specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Team leader Credit & Funds Management Reticulation.	
<b>Observations</b> The Licensee does not provide any concessions.	
<b>Compliance summary</b> Not Applicable	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 237 (236)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, the general energy efficiency information specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation	

Examined the Licensee's website
<b>Observations</b> No request for the general energy efficiency information received during the audit period. The information is available from the licensee.
<b>Compliance summary</b> Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 238 (237)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must give information to the customer, or refer the customer to the relevant distributor for a response, if asked by a customer for information relating to the distribution of gas.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b> As the retailer and the Distributor are the same company, information of this type is readily provided to the customer.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 239 (238)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5A	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer must lodge with the Authority a gas customer safety awareness program in the manner and timeframes specified.	
<b>Verification/Tests</b> Interviewed Acting Team Leader Reticulation and Retail and Marketing Manager	
<b>Observations</b> The customer awareness program has been previously lodged with the Authority.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 241 (240)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.9	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer, distributor and marketer must, to the extent practicable, ensure that any written information that must be given to a customer under the Gas Customer Code is expressed in clear, simple, and concise language and is in a format that makes it easy to understand.	
<b>Verification/Tests</b>	
Interviewed the Acting Team Leader Reticulation Examined information provided on the website and to customers	
<b>Observations</b>	
Information provided to a customer under the Gas Customer Code is in the auditor's opinion expressed in clear, simple, and concise language and is in a format that makes it easy to understand.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 242 (241)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Gas Customer Code.	
<b>Verification/Tests</b>	
Interviewed the Acting Team Leader Reticulation Examined website	
<b>Observations</b>	
The information provided was sufficient for me to download a copy from the Licensee's website or the Authority's website and I was also informed that i could obtain a hard copy from the office of the Licensee.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 243(242)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer and distributor must make electronic copies of the Gas Customer Code available, at no	

charge, on their website.
<b>Verification/Tests</b> Interviewed the Acting Team Leader Reticulation Examined website.
<b>Observations</b> The Gas Customer code is available on the licensee's website.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>244 (243)</b> Trading Licence clause 2.1 and Schedule Gas Customer Code clause 10.10(3)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make a copy of the Gas Customer Code available for inspection, at no charge, at their offices.	
<b>Verification/Tests</b> Interviewed the Acting Team Leader Reticulation and Retail and Marketing Manager	
<b>Observations</b> Copies available and requested copy of the Gas Customer Code whilst at the office of the Licensee and was able to view a hard copy. Informed that copies available at other branch offices.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 245 (244)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined customer charter on website and bill.	
<b>Observations</b> All written information provided by the licensee apart from the bill contains information that assist the residential customer in interpreting information provided by the retailer or distributor. In addition	

the call centre will provide the customer with information on interpreting services.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 246 (245)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11M</i> A retailer and, where appropriate a distributor, must include the telephone number for their special information services and for independent multi-lingual services and the National Interpreter Symbol, with the words "Interpreter Services', on the documents specified.	
<b>Verification/Tests</b> Examined bills, letters and information on the licensee's website	
<b>Observations</b> The licensee does provides the information on the documents specified with the exception of the bill.	
<b>Compliance summary</b> Non-compliant	
<b>Corrective Action/Opportunity for Improvement</b> The bill to include the telephone number for independent multi-lingual services and National Interpreter Symbol.	

<b>Item 247 (250)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	
<b>Verification/Tests</b> Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints manual and records	
<b>Observations</b> A Manual has been developed by the licensee on how to deal with complaints and resolve disputes and is available to all employees on the licensee's intranet.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 248 (251)</b> Trading Licence clause 2.1 and Schedule 2	Compliance rating Compliant-5
Gas Customer Code clause 12.1(2) <i>Energy Coordination Act section 11M</i>	
A retailer and distributor must develop, maintain and implement a complaints handling process that meets the specified requirements.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints manual and records	
<b>Observations</b>	
A Manual has been developed by the licensee on how to deal with complaints and meets the code requirements.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 249 (252)</b> Trading Licence clause 2.1 and Schedule 2	Compliance rating Compliant-5
Gas Customer Code clause 12.1(3) <i>Energy Coordination Act section 11M</i>	
A retailer or distributor must at least provide the specified advice to a customer when handling a complaint.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints manual and records	
<b>Observations</b>	
The Manual provides for all the specified advice required in the Gas Customer Code to be given to a customer who contacts the licensee with a complaint. Licensee's customer service and call centre staff are trained to provide the specified advice and discussions with call centre staff confirmed that correct advice is provided.	
<b>Compliance summary</b>	
Compliant.	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 250 (253)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must comply with any guideline developed by the Authority relating to distinguishing customer queries from customer complaints.	

<b>Verification/Tests</b>
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints manual and records
<b>Observations</b>
The requirements contained in the guidelines issued by the Authority relating to distinguishing customer queries from customer complaints have been incorporated into the licensee's process for dealing with customer complaints.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 251 (254)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	Compliance rating Non-compliant-1
<i>Energy Coordination Act section 11M</i>	
A retailer, distributor and marketer must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant	
<b>Observations</b>	
No process or information exists on how a customer on request, at no charge, gets information that will assist the customer in utilising the respective complaints handling processes.	
<b>Compliance summary</b>	
Significant non compliance	
<b>Corrective Action/Opportunity for Improvement</b>	
Complaints manual to be amended to include information on how a customer on request, at no charge, gets information that will assist the customer in utilising the respective complaints handling processes and a brochure developed for handing to the customer.	

<b>Item 252 (255)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer, distributor or marketer who receives a complaint that does not relate to its functions, must refer the complaint to the appropriate entity and inform the customer of the referral.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaint manual and policy	
<b>Observations</b>	
No complaint received during the audit period that needed to be referred. A process exists for referring a complaint to the appropriate entity and informing the customer of the referral.	
<b>Compliance summary</b>	

Not rated
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 253 (256)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer, distributor or marketer must keep a record or other information as required to be kept by the Gas Customer Code for at least two years from the last date on which the information was recorded, unless expressly provided otherwise.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined records	
<b>Observations</b>	
All relevant information is retained.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 254 (257)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.2	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the total number and percentage of customers under the affordability and access indicators specified.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined database containing information on affordability and access indicators.	
<b>Observations</b>	
Records kept on required information even if the number is zero.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 255 (258)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(1)	Compliance rating Compliant - 5
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the customer complaint indicators specified.	

<b>Verification/Tests</b>
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints database
<b>Observations</b>
No complaints received during the audit period. Records kept even if number zero.
<b>Compliance summary</b>
Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 256 (259)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a copy of each complaint referred to in clause 13.3(1) (including complaints made directly to a marketer).	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager and Learning and Development Consultant Examined complaints database	
<b>Observations</b>	
No complaints received during the audit period. However the licensee has processes in place to keep copies of complaints and to record them in a database together with the outcome.	
<b>Compliance summary</b>	
Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 257 (260)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.5	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the call centre performance indicators specified.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined records kept by licensee for the call centre	
<b>Observations</b>	
Examination of call centre records confirmed required information is recorded and retained.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

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<b>Item 258 (261)</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.6	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the total number of residential and business accounts specified.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined customer database	
<b>Observations</b>	
Examination of the customer database confirmed a record of all residential and business accounts for the reticulation systems are maintained.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 265</b> Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i>	
A retailer and a distributor must prepare a report setting out the information required by Part 13 of the Gas Customer Code, in respect of each year ending on 30 June. The report must be published no later than the following 1 October.	
<b>Verification/Tests</b>	
Interviewed Reticulation Manager Examined annual performance report submitted by licensee	
<b>Observations</b>	
The report was prepared submitted and published in accordance with the required timeframe.	
<b>Compliance summary</b>	
Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 266</b> Trading Licence clause 2.1 and Schedule Gas Customer Code clause 13.15(3)	Compliance rating Non-Compliant-2
<i>Energy Coordination Act section 11M</i>	
A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.	
<b>Verification/Tests</b>	

Interviewed Reticulation Manager

Examined annual performance report submitted by licensee

**Observations**

The report was provided to the Authority at least 7 days before publication and the licensee was under the impression that the Authority was responsible for providing a copy to the Minister.

**Compliance summary**

Non-compliant

**Corrective Action/Opportunity for Improvement**

Process to be developed by licensee for submitting the report directly to the Minister within the required timeframe.

## OBLIGATIONS SPECIFIC TO SETEMBER 2009 GAS COMPLIANCE MANUAL

<b>Item 109</b> Trading Licence clause 14.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee must prepare a customer service charter.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b> Customer service charter has been prepared and is available on the licensee's website.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 110</b> Trading Licence clause 14.1	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A licensee must, unless otherwise notified in writing by the Authority, review the customer service charter at least once every 36 months and submit the results of that review to the Authority within 5 days after it is completed.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined OMS Document register	
<b>Observations</b> The customer service charter was reviewed in October 2009 and the need to review is now included in the OMS document register.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 119</b> Trading Licence clause 21.1 and 21.2 Code of Conduct clause 2.2	Compliance rating Non-compliant-2
<i>Energy Coordination Act section 11ZPP</i> A marketer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified.	
<b>Verification/Tests</b> Interviewed Retail and Marketing Manager	

<b>Observations</b>
A detailed examination of the Gas Marketing Code of Conduct (GMCOC) has revealed that the licensee engages in door to door marketing via the telephone and by electronic means. As the licensee was unaware that some of the activities of customer service officers under the definition contained in the GMCOC is classed as marketing the licensee needs to review its activities to ensure compliance with the GMCOC.
<b>Compliance summary</b>
Non-compliant
<b>Corrective Action/Opportunity for Improvement</b>
All customer service officers to be made aware of the GMCOC and the associated requirements via a training circular. The training circular document to provide an overview of the code, and outline the licensee's requirements under the code and how compliance will be achieved.

<b>Item 203</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must allow a temporary suspension of actions for a period of at least 10 days.	
<b>Verification/Tests</b> Interviewed Team Leader Credit-funds management Reticulation Examined customer database and records	
<b>Observations</b> No instances occurred during the audit period that required temporary suspension of actions.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 216</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Compliance rating Non-Compliant-2
<i>Energy Coordination Act section 11M</i> A retailer must give a customer, financial counsellor or relevant consumer representative organisation, on request, details of the financial hardship policy, at no charge.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b> The licensee has still to finalise and implement a financial hardship policy.	
<b>Compliance summary</b> Non compliant	
<b>Corrective Action/Opportunity for Improvement</b> Hardship policy to be finalised and implemented.	

<b>Item 236</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, the general energy efficiency information specified.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b> No requests from customers received during the audit period for energy efficiency information. However if a request for such information was received, the licensee has the information available.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 244</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.6	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer or distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified.	
<b>Verification/Tests</b> Interviewed Reticulation Manager	
<b>Observations</b> No disconnections occurred during the audit period. It is the policy of the licensee not to disconnect a customer's supply.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 246</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.1(1)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must produce and publish a Customer Service Charter.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined Customer Service Charter	
<b>Observations</b>	

Customer Service Charter available on the licensee's website.
<b>Compliance summary</b> Compliant
<b>Corrective Action/Opportunity for Improvement</b>

<b>Item 247</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.1(2)	Compliance rating Compliant-5
<i>Energy Coordination Act section 11M</i> A retailer and distributor must address the specified information in their Customer Service Charters.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined Customer Service Charter	
<b>Observations</b> The Customer Service Charter addresses the specified information required in the Gas Customer Code.	
<b>Compliance summary</b> Compliant	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 248</b> Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.2(1)	Compliance rating Not rated
<i>Energy Coordination Act section 11M</i> A retailer and distributor must give a customer on request, at no charge, a copy of the Customer Service Charter.	
<b>Verification/Tests</b> Interviewed Reticulation Manager Examined Customer Service Charter	
<b>Observations</b> No requests received from customers during the audit period for a copy of the customer service Charter. . However if a request was received the licensee would provide a copy to a customer at no charge.	
<b>Compliance summary</b> Not rated	
<b>Corrective Action/Opportunity for Improvement</b>	

<b>Item 249</b> Trading Licence clause 2.1 and Schedule 2	Compliance rating
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Gas Customer Code clause 11.2(2)	Not rated
<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer and distributor must dispatch a copy of the Customer Service Charter to a customer who requests a copy, within two business days of the request.</p>	
<p><b>Verification/Tests</b></p> <p>Interviewed Reticulation Manager</p> <p>Examined Customer Service Charter</p>	
<p><b>Observations</b></p> <p>No requests received from customers during the audit period for a copy of the customer service Charter. However if a request was received the licensee would provide a copy within the required time frame.</p>	
<p><b>Compliance summary</b></p> <p>Not rated</p>	
<p><b>Corrective Action/Opportunity for Improvement</b></p>	

## APPENDIX 2 COMPLIANCE SUMMARY

**LICENCE COMPLIANCE REQUIREMENTS ENERGY COORDINATION ACT 1994**

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
1.	(1.)	Energy Coordination Act section 11Q(1-2)	Distribution Licence clause 4.1 Trading Licence clause 4.1	Moderate	Unlikely	Medium	Moderate	4		<input checked="" type="checkbox"/>					
2.	(2.)	Energy Coordination Act section 11WG(1)	Trading Licence clause 12.1	Moderate	Unlikely	Medium	Moderate	4			<input checked="" type="checkbox"/>				
3.	(3.)	Energy Coordination Act section 11WG(2)	Trading Licence clause 13.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
4..	(4.)	Energy Coordination Act section 11WK(1-2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5				<input checked="" type="checkbox"/>			
5.	(5.)	Energy Coordination Act section 11WK(3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
6.	(6.)	Energy Coordination Act section 11X(3)	Trading Licence clause 5.1, Distribution Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
10.	(10.)	Energy Coordination Act section 11ZA(1)	Trading Licence clause 16.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
17.	(17.)	Energy Coordination Act section 11ZK(3)	Trading Licence clause 5.1,	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
24.	(24.)	Energy Coordination Act section 11ZQH	Distribution Licence clause 17, Trading Licence clause 18.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

**LICENCE COMPLIANCE REQUIREMENTS – GAS STANDARDS ACT 1972**

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
25.	(25.)	Energy Coordination Act section 11Z	Trading Licence clause 5.1,	Major	Unlikely	High	Strong	2					<input checked="" type="checkbox"/>		

**LICENCE COMPLIANCE REQUIREMENTS – ENERGY COORDINATION (CUSTOMER CONTRACTS) REGULATIONS 2004**

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
32.	(32.)	Energy Coordination (Customer Contracts) Reg 12 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
33.	(33.)	Energy Coordination (Customer Contracts) Reg 12 (4)(a)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
34.	(34.)	Energy Coordination (Customer Contracts) Reg 12 (4)(b)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
35.	(35.)	Energy Coordination (Customer Contracts) Reg 12 (5)(a)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
36.	(36.)	Energy Coordination (Customer Contracts) Reg 12 (5)(b)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
37.	(37.)	Energy Coordination (Customer Contracts) Reg 12 (5)(c)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
38.	(38.)	Energy Coordination (Customer Contracts) Reg 12 (5)(d)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
39.	(39.)	Energy Coordination (Customer Contracts) Reg 12 (5)(e)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
40.	(40.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
41.	(41.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
42.	(42.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
43.	(43.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.3.1 & 5.1.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
44.	(44.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
45.	(45.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 &5.1.5.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
46.	(46.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.7.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
47.	(47.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
48.	(48.)	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(b) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
49.	(49.)	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(c) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
50.	(50.)	Energy Coordination (Customer Contracts) Reg 12 (6),  Clause 5.1.8.1(d) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
51.	(51.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and (f) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
52.	(52.)	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
53.	(53.)	Energy Coordination (Customer Contracts)Reg 13 (1), Clause 4.4.6.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
54.	(54.)	Energy Coordination (Customer Contracts) Reg 13 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
55.	(55.)	Energy Coordination (Customer Contracts) Reg 13 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
56.	(56.)	Energy Coordination (Customer Contracts) Reg 14 (2),	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5				<input checked="" type="checkbox"/>			
57.	(57.)	Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					
58.	(58.)	Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
59.	(59.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
60.	(60.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 AGA Code	Trading Licence clause 5.1	Major	Unlikely	High	Strong	2	<input checked="" type="checkbox"/>						
61.	(61.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
62.	(62.)	Energy Coordination (Customer Contracts) Reg 15 (1) and (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5						<input checked="" type="checkbox"/>	
63.	(63.)	Energy Coordination (Customer Contracts) Reg 15 (1) and 47 (2) and (4), Clause 4.2.3.4 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
64.	(64.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
65.	(65.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
66.	(66.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
67.	(67.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
68.	(68.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
69.	(69.)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
70.	(70.)	Energy Coordination (Customer Contracts) Reg 16 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
71.	(71.)	Energy Coordination (Customer Contracts) Reg 19	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
72.	(72.)	Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5				<input checked="" type="checkbox"/>			
73.	(73.)	Energy Coordination (Customer Contracts) Reg 27 (4) and 40 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					
74.	(74.)	Energy Coordination (Customer Contracts) Reg 20 (3) and 48	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
75.	(75.)	Energy Coordination (Customer Contracts) Reg 22 and 49 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
76.	(76.)	Energy Coordination (Customer Contracts) Reg 49 (3)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
77.	(77.)	Energy Coordination (Customer Contracts) Reg 49 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
78.	(78.)	Energy Coordination (Customer Contracts) Reg 49 (5)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
79.	(79.)	Energy Coordination (Customer Contracts) Reg 50	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
80.	(80.)	Energy Coordination (Customer Contracts) Reg 44	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
81.	(81.)	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
82.	(82.)	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					
83.	(83.)	Energy Coordination (Customer Contracts) Reg 46 (1) & (2)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
84.	(84.)	Energy Coordination (Customer Contracts) Reg 46 (4)	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequence	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
85.		Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
86.		Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
90.	(90.)	Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code	Trading Licence clause 5.1,	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
91.	(91.)	Energy Coordination (Customer Contract) Reg 42	Trading Licence clause 5.1	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

## LICENCE COMPLIANCE REQUIREMENTS – LICENCE CONDITIONS

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
96.	(96.)	Energy Coordination Act section 11M	Trading Licence clause 16.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
97.	(97.)	Energy Coordination Act section 11M	Trading Licence clause 16.4	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
98.	(98.)	Energy Coordination Act section 11M	Trading Licence clause 17	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
99.	(99.)	Energy Coordination Act section 11M	Trading Licence clause 20	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
100.	(100.)	Energy Coordination Act section 11M	Distribution Licence clause 19.1, Trading Licence clause 21.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
101.	(101.)	Energy Coordination Act section 11M	Trading Licence clause 22.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
102.	(102.)	Energy Coordination Act section 11M	, Trading Licence clause 23.1	Major	Unlikely	High	Strong	2					<input checked="" type="checkbox"/>		
103.	(103.)	Energy Coordination Act section 11M	Trading Licence clause 24	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
106.	(106.)	Energy Coordination Act section 11M	Trading Licence clause 12.2	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					
107	(107.)	Energy Coordination Act section 11M	Trading Licence clause 12.3	Minor	Unlikely	Low	Moderate	5		<input checked="" type="checkbox"/>					
108.	(108.)	Energy Coordination Act section 11M	Trading Licence clause 13.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
109.	(111.)	Energy Coordination Act section 11M	Trading Licence clause 15.1 and 15.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
110.	(112.)	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.5	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
111.	(113.)	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.7	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
112.	(114.)	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 2.1 to 2.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
113.	(115.)	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 3.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

## LICENCE COMPLIANCE REQUIREMENTS – GAS MARKETING CODE OF CONDUCT

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
114.	(116.)	Energy Coordination Act section 11ZPP	Trading Licence clause 19.1.	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
115.	(117.)	Energy Coordination Act sections 11ZPP and 11M	Trading Licence clause19.2	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
116.	(118.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.1	Trading Licence clause 19.1	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
117.	(120.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
118.		Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
119.	(121.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
120.	(122.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
121.	(123.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4				<input checked="" type="checkbox"/>			
122.	(124.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
123.	(125.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
124.	(126.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
125.	(127.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
126.	(128.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
127.	(129.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
128.	(130)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
129.	(131.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.5(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
130.	(132.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
131.	(133.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
132.	(134.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
133.	(135.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
134.	(136.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
135.	(137.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(6)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
136.	(138.)	Energy Coordination Act section 11ZPP Code of Conduct clauses 2.6(7) and 2.6(8)	Trading Licence clause 19	Minor	Unlikely	Low	Moderate	5	<input checked="" type="checkbox"/>						
137.	(139.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
138.	(140.)	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
139.	(141.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(3)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
140.	(142.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(4)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
141.	(143.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.7(5)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
142.	(144.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.8	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
143.	(145.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.11(1)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
144.	(146.)	Energy Coordination Act section 11ZPP  Code of Conduct clause 2.11(2)	Trading Licence clause 19	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

## LICENCE COMPLIANCE REQUIREMENTS – GAS CUSTOMER CODE

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
145.	(147.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
146.	(148.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 3.1(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
147.	(149.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
148.	(150.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
149.	(151.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
150.	(152.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(4)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
151.	(153.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(5)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
152.	(154.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.2(6)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
153.	(155.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
154.	(156.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.3(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
155.	(157.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.4	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
156.	(158.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(1)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
157.	(159.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.5(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
158.	(160.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
159.	(161.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.6(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
160.	(162.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.7	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
161.	(163.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
162.	(164.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
163.	(165.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.8(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
164.	(166.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.9	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
165.	(167.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.10	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
166.	(168.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
167.	(169.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.11(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
168.	(170.)	Energy Coordination Act section M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.12(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
169.	(171.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.13	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
170.	(172.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(1)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
171.	(173.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.14(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
172.	(174.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(1)	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
173.	(175.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.15(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
174.	(176.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.16	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
175.	(177.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
176.	(178.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.17(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
177.	(179.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.18(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
178.	(180.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(2) and 4.19(6)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
179.	(181.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
180.	(182.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 4.19(4)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
181.	(183.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
182.	(184.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
183.	(185.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.2(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
184.	(186.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.3	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
185.	(187.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
186.	(188.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.5	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
187.	(189.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
188.	(190.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
189.	(191.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
190.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.6(4)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
191.	(192.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
192.	(193.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
193.	(194.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.7(4)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
194.	(195.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
195.	(196.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
196.	(197.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.8(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
197.	(198.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 5.9	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
198.	(199.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(1)	Moderate	Unlikely	Medium	Moderate	4				<input checked="" type="checkbox"/>			
199.	(200.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(2)	Minor	Unlikely	Low	Moderate	5					<input checked="" type="checkbox"/>		
200.	(201.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.1(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
201.	(202.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
202.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
203.	(204.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(3)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
204.	(205.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.3	Moderate	Unlikely	Medium	Moderate	4				<input checked="" type="checkbox"/>			
205.	(206.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Code of Conduct clause 6.4(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
206.	(207.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.4(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
207.	(208.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(1)	Minor	Moderate	Low	Moderate	5							<input checked="" type="checkbox"/>
208.	(209.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.6(2)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
209.	(210.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.7	Minor	Moderate	Low	Moderate	5							<input checked="" type="checkbox"/>
210.	(211.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.8	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
211.	(212.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
212.	(213.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.9(2)	Minor	Unlikely	Low	Moderate	5							<input checked="" type="checkbox"/>
213.	(214.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(1)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
214.	(215.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(2)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
215.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
216.	(217.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(4)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
217.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(5)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
218.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(7)	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
219.	(218.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.11	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
220.	(219.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.1	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
221.	(220.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.2	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
222.	(221.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.3	Moderate	Unlikely	Medium	Moderate	4						<input checked="" type="checkbox"/>	
223.	(222.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
225.	(224.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 7.6	Major	Unlikely	High	Strong	2							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
226.	(225.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
227.	(226.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 8.1(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
229.	(228.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(1)	Moderate	Unlikely	Medium	Moderate	4		<input checked="" type="checkbox"/>					

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
230.	(229.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
231.	(230.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.1(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
232.	(231.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(1)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
233.	(232.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
234.	(233.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(3)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
235.	(234.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.2(4)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
236.	(235.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.3	Moderate	Unlikely	Medium	Moderate	4						<input checked="" type="checkbox"/>	
237.	(236.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
238.	(237.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
239.	(238.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.5A	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
241.	(240.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.9	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
242.	(241.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
243.	(242.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
244.	(243.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.10(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
245.	(244.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
246.	(245.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.11(2)	Moderate	Unlikely	Medium	Moderate	4		<input checked="" type="checkbox"/>					
247.	(250.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
248.	(251.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(2)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
249.	(252.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.1(3)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
250.	(253.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
251.	(254.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.3	Moderate	Unlikely	Medium	Moderate	4	<input checked="" type="checkbox"/>						
252.	(255.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 12.4	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
253.	(256.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.1	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
254.	(257.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.2	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
255.	(258.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		

November 2009 manual Ref number	September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
256.	(259.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.3(2)	Moderate	Unlikely	Medium	Moderate	4							<input checked="" type="checkbox"/>
257.	(260.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.5	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
258.	(261.)	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.6	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
265.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.15(1)	Moderate	Unlikely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
266.		Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 13.15(3)	Moderate	Unlikely	Medium	Moderate	4		<input checked="" type="checkbox"/>					

## OBLIGATIONS SPECIFIC TO SEPTEMBER 2009 GAS COMPLIANCE MANUAL

September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr
109.	Energy Coordination Act section 11M	Trading Licence clause 14.1	Minor	Likely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
110.	Energy Coordination Act section 11M	Trading Licence clause 14.2	Minor	Likely	Medium	Moderate	4					<input checked="" type="checkbox"/>		
119.	Energy Coordination Act section 11ZPP Code of Conduct clause 2.2	Trading Licence clause 21.1 and 21.2	Minor	Likely	Medium	Moderate	4		<input checked="" type="checkbox"/>					
203.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.2(2)	Minor	Likely	Medium	Moderate	4							<input checked="" type="checkbox"/>
216.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 6.10(3)	Minor	Likely	Medium	Moderate	4		<input checked="" type="checkbox"/>					
236.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 10.4	Minor	Likely	Medium	Moderate	4							<input checked="" type="checkbox"/>
244.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause	Minor	Likely	Medium	Moderate	4							<input checked="" type="checkbox"/>

		10.11(1)													
September 2009 Manual Ref number	Obligations under	Licence conditions	Consequences	Likelihood	Inherent Risk	Adequacy of Existing Controls	Review Priority	Rating 1	Rating 2	Rating3	Rating 4	Rating 5	Rating Na	Rating Nr	
246.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.1(1)	Minor	Likely	Medium	Moderate	4					<input checked="" type="checkbox"/>			
247.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.1(2)	Minor	Likely	Medium	Moderate	4					<input checked="" type="checkbox"/>			
248.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.2(1)	Minor	Likely	Medium	Moderate	4							<input checked="" type="checkbox"/>	
249.	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Gas Customer Code clause 11.2(2)	Minor	Likely	Medium	Moderate	4							<input checked="" type="checkbox"/>	