



Origin Energy Retail Limited Economic Regulation Authority

Performance Audit – Western Australia Gas Trading Licence (GTL13)
Post Audit Implementation Plan

2 April 2026

Post Audit Implementation Plan

The following table has been prepared by Origin using the Recommendations to address current non-compliances controls and deficiencies, from the Performance Audit in relation to Origin's Western Australia Gas Trading Licence (GTL13), prepared by RSM Pty Ltd.

Recommendations to address current non-compliances and control deficiencies

Unresolved at end of current audit period			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Proposed action by the licensee
01/2025	<p>B 2</p> <p>120A Energy Coordination Act section 11ZPP</p> <p>Code of Conduct clauses 2.32 and 6(2)</p> <p>Sample testing of 75 customer sales noted 34 customer sales via Origin's online process and 41 customer sales via telephone calls. For 2 out of the 41 customer sales via telephone calls, Origin has not explicitly advised the customer of the differences between Standard Form and Non-Standard Form Contracts.</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> ▪ Reinforce the importance of explicitly explaining the difference between Standard and Non-Standard Contracts, not just comparing Origin plans. This can be done through refresher training or updated call scripts. ▪ Implement a quality assurance check for a sample of calls on a periodic basis to ensure compliance with contract disclosure requirements. 	<p>Management Action Plan:</p> <p>Origin has updated call scripts to explain the attributes of standing agreements.</p> <p>In addition, Origin has undertaken the following actions:</p> <ul style="list-style-type: none"> • Implemented quality assurance checks for a sample of 10 calls this quarter, and 5 samples call per quarter ongoing to ensure the process is embedded amongst agents and provide coaching and feedback where required. • Implemented agent refresher training to reinforce the updated call scripting. <p>Resolution Date: Completed</p>
02/2025	<p>B 2</p> <p>137 Energy Coordination Act section 11M</p> <p>Compendium clauses 4.1(b) / 10(1) and 10(2)</p> <p>Sample testing of customer complaints identified a case where a customer had not received a bill for eight months. When billing</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> ▪ Investigate the root causes for the non-compliance noted above. ▪ Ensure the relevant corrective actions are implemented to avoid any-future occurrences; and ▪ Re-assess the effectiveness of the monitoring controls implemented to identify exceptions 	<p>Management Action Plan:</p> <p>Origin is monitoring calls and complaints in relation to delayed bills. Additionally, Origin has undertaken work to improve move and transfer processes to ensure data points are aligned which reduces the risk of bill delays. On 30 September 2025, Origin has implemented daily late bill reporting for WA</p>

Unresolved at end of current audit period			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Proposed action by the licensee
	resumed, the customer was issued a bill exceeding \$1,000, which they were unable to pay.	relating to the timely issuance of bills within the maximum timeframe allowed by the Compendium.	customers. This report captures WA accounts that are 95+ days without a bill, and the reason the account is not billed (e.g. missing meter data). Origin's billing team monitor this report daily, attempt rectify the root cause for the late bill and bill the accounts within the 100-day period. Resolution Date: Completed
03/2025	<p>C 3</p> <p>155 Energy Coordination Act section 11M Compendium clause 4.8(2) / 15(1)</p> <p>Our review of the 2022 Estimated Bill template noted that it does not clearly state that Origin will provide the basis and reason for the estimation upon customer request. Further reviews of the 2023, 2024, and 2025 Estimated Bill templates noted that they do not clearly specify the customer's right to request a meter reading.</p> <p>As this represents a significant control deficiency, sample testing was not performed for Estimated Bills.</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> Update all Estimated Bill templates to include a standardised and clearly visible statement informing customers of their rights covering the information prescribed in clauses 15(1)(a) to (c); Implement a quality assurance process to ensure the statement is consistently included in all future estimated bills. Provide training or guidance to relevant teams to reinforce the importance of including this information. 	<p>Management Action Plan:</p> <p>Origin has updated estimated bill templates to include the prescribed information.</p> <p>Origin has enhanced our bill testing assurance processes to include WA-specific scenarios, ensuring relevant information is not unintentionally removed in future.</p> <p>Completed Date: Completed</p>
04/2025	<p>C 3</p> <p>165 Energy Coordination Act section 11M Compendium clauses 4.14(2) and 23(2)</p> <p>180C Energy Coordination Act section 11M Compendium clause 23(2)</p> <p>A review of 12 final bills issued during or after 2024, identified 6 instances where the bill did not include a request for the customer to provide instructions regarding the handling of</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> Consider implementing a mandatory prompt within the Kraken system to request customer instructions regarding the handling of credit balances at the time of account closure. Consider introducing system notifications to flag outstanding customer instruction requests. 	<p>Management Action Plan:</p> <p>Origin has implemented an ongoing Credit Refund Action Letter process which provides customers with the required information within days of receiving their final bill.</p> <p>Additionally, Origin has implemented bill messaging, however, is updating this messaging to explicitly ask customer for instructions to handle their credit balance.</p>

Unresolved at end of current audit period			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Proposed action by the licensee
	the credit balance as required by the obligation.	<ul style="list-style-type: none"> ▪ If system automation is not feasible, implement periodic quality assurance checks to verify that final bills with credit balances include the required instruction prompts and Origin has followed up with customers on outstanding instruction requests in a timely manner. ▪ Ensure that all final bills, regardless of issuance date, include clear guidance asking whether the credit should be: <ul style="list-style-type: none"> - Transferred to another account the customer holds (or will hold) with Origin, or - Refunded to a nominated bank account. 	<p>Completed Date: Completed</p>
05/2025	<p>B 2</p> <p>167 Energy Coordination Act section 11M Compendium clause 4.16(1)(a) / 19(2)(a)</p> <p>A review of Origin's residential bill review template confirmed that customers are advised of their right to request a meter test and informed about the Standard Complaints and Dispute Resolution Procedure (SCDRP) when a bill is deemed correct. However, sample testing of 8 bills from 2020 to 2023 identified 2 instances where this advice was not provided, indicating non-compliance with the obligation during that period.</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> • Update the bill review templates to include mandatory fields or standard language that cannot be omitted, ensuring consistent communication of: • The right to request a meter test; and • Details of the Standard Complaints and Dispute Resolution Procedure. • Conduct periodic audits of bill reviews to verify compliance with the Billing Manual. • Provide refresher training to staff involved in bill reviews, emphasising the importance of advising customers of the rights, including meter testing and dispute resolution options. 	<p>Management Action Plan:</p> <p>Origin advises all customers of their right to request a meter test on their bills. However, to ensure this information is consistently provided to customers when a bill review is undertaken, Origin has implemented the following additional actions;</p> <ul style="list-style-type: none"> • Origin's process documents were updated to include sending closure templates following bill review complaints with customers. • Staff communications have been sent to operations teams to remind agents of processes of advising customers of their rights after a bill review is completed. <p>Additionally, Origin will conduct periodic samples of 10 bill enquiry complaints per quarter to ensure this process is embedded.</p> <p>Resolution Date:</p>

Unresolved at end of current audit period			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Proposed action by the licensee
			Completed
06/2025	<p>C 3</p> <p>204 Energy Coordination Act section 11M Compendium clause 6.3(1)</p> <p>205A Energy Coordination Act section 11M Compendium clause 35(3)</p> <p>211 Energy Coordination Act section 11M Compendium clause 6.8 / 39(3)</p> <p>A review of 20 hardship accounts (10 established prior to 2024 and 10 established during or after 2024) noted the following exceptions:</p> <p><u>Hardship Accounts Established Prior to 2024</u></p> <ul style="list-style-type: none"> Origin employees did not inform customers of their right to have their bill redirected at no cost to a third party, for 2 out of 10 Hardship accounts. <p><u>Hardship Accounts Established During or After 2024</u></p> <ul style="list-style-type: none"> Customers were not informed of their right to have their bill redirected at no cost to an alternative address, including email, highlighting a gap in customer communication and adherence to policy requirements, for 8 out of 10 hardship accounts. <p><i>Note: Obligation 204 was removed from the WA Gas Trading Licence obligations as of 2024.</i></p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> Reinforce staff training and procedural guidance to ensure that all aspects of available assistance, including bill redirection rights, are consistently communicated to customers. Enhance the Quality Assurance activities to ensure that procedures in place are adhered to in assisting the customers experiencing payment difficulties or financial hardships. Enhance staff training and guidance to ensure all hardship customers are consistently informed of their right to have bills redirected at no charge, whether to a third party or an alternative address (including e-mail). Strengthen documentation practices to ensure that all interactions regarding fee, charge, or debt reductions are clearly recorded and verifiable. Implement a verification mechanism to confirm that customers requesting the Hardship Policy, receive it in a timely manner, with evidence retained for audit purposes. Conduct periodic audits of hardship account communications to monitor compliance. 	<p>Management Action Plan:</p> <p>Origin has provided refresher communications to agents to reinforce WA specific hardship obligations. In addition, Origin will conduct periodic samples of 10 hardship enrolments each quarter over a 12-month period to assess whether hardship obligations have been met and provide feedback and coaching if required. Further, Origin will ensure WA hardship process checks are specifically included as part of Origin's quarterly assurance program. The program includes assessing adherence to process and whether appropriate notes are recorded on customers accounts and if the customer has received the requested documents.</p> <p>Resolution Date:</p> <p>Completed</p>
07/2025	<p>B 2</p> <p>254 Energy Coordination Act section 11M Compendium clause 12.1(3)(a)</p> <p>255 Energy Coordination Act section 11M</p>	<p>We recommend that Management:</p> <ul style="list-style-type: none"> Reinforce training and awareness among front-line staff regarding escalation rights as outlined in the Complaints Procedure. 	<p>Management Action Plan:</p> <p>Origin conducted refresher training for complaints to include WA specific complaint handling obligations.</p>

Unresolved at end of current audit period			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Proposed action by the licensee
	<p>Compendium clause 12.1(3)(b) Out of a sample of 12 complaints raised prior to 2024, 5 cases lacked evidence confirming resolution to the customer's satisfaction. In all 5 instances, Origin personnel did not inform customers of their right to escalate the complaint to a senior employee or to refer the matter to the gas ombudsman or another external dispute resolution body, including providing the Free call number.</p> <p>257A Energy Coordination Act section 11M Compendium clause 61 Of a sample of 13 complaints raised during or after 2024, 3 cases lacked evidence confirming resolution to the customer's satisfaction. In each of these cases, Origin personnel did not inform customers of their right to escalate the complaint to the gas ombudsman or another external dispute resolution body, nor did they provide the Free call telephone number.</p> <p><i>Note: Obligations no. 254 and 255 were removed from the WA Gas Trading Licence obligations as of 2024.</i></p>	<ul style="list-style-type: none"> Implement a checklist within the complaints handling workflow to ensure customers are informed of their escalation options when a complaint remains unresolved. Conduct periodic audits to verify compliance with this requirement and identify any recurring gaps. 	<p>In addition, Origin has reviewed processes to ensure steps are clear for the agent handling the complaint.</p> <p>Additionally, Origin will also conduct audits of 10 interaction complaints from WA customers each quarter to ensure adherence to processes. Any feedback is provided as coaching to the agent.</p> <p>Resolution Date: Completed</p>